



Mr Samuel Borries, On-Scene Coordinator
USEPA Region 5
77 W. Jackson Blvd. (SE-5J)
Chicago, IL 60604

Subject
Contractor Quality Management Plan
Plainwell Time Critical Removal Action (TCRA)
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site

Dear Sam:

As outlined in Paragraph 11 of the 2007 Administrative Settlement Agreement and Order on Consent for Removal Action for the Allied Paper, Inc /Portage Creek/ Kalamazoo River Superfund Site (Site), submittal to USEPA of a copy of the proposed contractor's Quality Management Plan (QMP) is required. Therefore, a copy of ARCADIS BBL's QMP is enclosed with this letter. This QMP was previously submitted to USEPA in an e-mail to Shari Kolak from Patrick McGuire on June 7, 2006, for the Time-Critical Removal Action for the Refuse Area at the Georgia-Pacific Corporation Kalamazoo Mill Property and the Oxbow Area at the Former Hawthorne Mill Property, and was subsequently approved by Sam Chummar of USEPA.

Please contact me if you have any questions

Sincerely,

ARCADIS of New York, Inc.

ARCADIS of New York, Inc
30 West Monroe
Suite 1710
Chicago
Illinois 60603
Tel 312 332 4937
Fax 312 332 4434
www.arcadis-us.com

INDUSTRIAL

Date
April 2, 2007

Contact
Steve Garbaciak

Phone
312.332 4937 x12

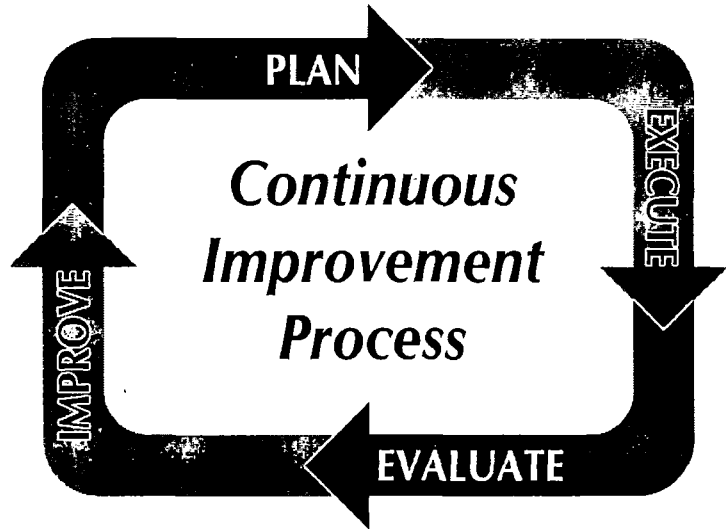
Email
- steve.garbaciak@arcadis-us.com

Our ref
B0064530 00670



BBL Quality Management Plan

August 2003



Getting from Better to Best

Corporate Quality Manager: Robert A. Reed Date: 8/13/03

Corporate Quality Officer: [Signature] Date: 8/13/03

Legal Counsel: [Signature] Date: 8/13/03

President: Edward R. Lynch Date: 8/13/03

Chief Executive Officer: [Signature] Date: 8/13/03

Quality Policy and Principles

At Blasland, Bouck & Lee, Inc., we have established a Quality Policy and 12 Quality Principles that form the basis of the Firm's continuous improvement activities. The policy and principles are available on the corporate Intranet and are provided below

QUALITY POLICY	<p>Continuous Improvement is the basis of our mission to be the "unparalleled provider" of service to our clients. We provide services in a manner that identifies and focuses on each of our client's requirements and expectations. These quality objectives are met by building value-added improvement activities into each and every work effort, not by simply adding quality-related tasks to our normal day-to-day activities. Resources are provided to achieve our quality goals, including but not limited to developing and implementing training programs and Quality Program assessment activities.</p>
QUALITY PRINCIPLES	<ul style="list-style-type: none"> • Quality is the responsibility of all employees, who must strive for continuous improvement, building quality into every activity to produce the unparalleled services our clients expect • All work activities must be planned based on the client's needs, taking into account quality goals, and applicable technology and regulatory requirements. • Personnel must be qualified to implement the work activities to which they are assigned. Objective evidence of qualifications must be established and maintained. • Procedures must be developed, documented, and approved for project activities. All such work must be performed and documented in accordance with the approved procedures. • Activities involving the acquisition of data must be planned and documented in order to identify the type, quality and quantity of data needed for the intended use • The procurement and use of materials, equipment, and services that affect the quality of the Firm's (defined on page 1-1) work must be planned and managed, and must conform to applicable contract, technical, and regulatory requirements. • All designs, plans, specifications, and other documents must be developed using sound engineering and scientific principles, and must meet appropriate industry standards. All designs, plans, specifications, and other documents must be reviewed, verified, and approved prior to issuance • Complete, accurate, and up-to-date records must be prepared and maintained for all project and program activities. • Sampling, measuring, and testing equipment must be maintained and calibrated in accordance with manufacturer's recommendations and industry standards. Calibration and maintenance records must be maintained. • Computer software and computer hardware/software configurations used in engineering, scientific, and accounting programs must be managed, maintained, and documented • Deviations from planned project activities must be documented and reported to management as they occur. The significance of a deviation on the project must be determined and appropriate adjustments must be made. • Engineering, scientific, and construction activities will be periodically evaluated to verify conformance with quality, technical, and regulatory requirements

Table of Contents

Preface	Quality Policy and Principles	
Section 1. Quality Management System		1-1
1.1	Continuous Improvement	1-1
1.2	Documentation of the Quality Management System ..	1-2
1.3	Management Responsibility and Commitment.....	1-3
Section 2. Planning Activities		2-1
2.1	Project Planning	2-1
2.2	Procurement of Products and Services	2-1
2.3	Control of Changes	2-2
2.4	Control of Measuring, Testing, and Monitoring Devices	2-2
2.5	Development of Client Quality Plans	2-2
2.6	Proposal Development Process	2-2
2.7	Computer Information Technology	2-2
Section 3. Execution Activities		3-1
3.1	Technical Document Process.....	3-1
3.2	Development and Verification of Figures, Tables, and Logs.....	3-1
3.3	Preparation of Calculations	3-2
3.4	Requirements for Field Sampling Plans	3-2
3.5	Documentation of Field Activities	3-2
3.6	Field Sampling Activities	3-2
3.7	Construction Inspection and Observation Activities	3-2
3.8	Development of Design Documents	3-3
3.9	Data Management	3-3
3.10	Design During Construction Activities	3-3
3.11	Operation, Maintenance, and Monitoring Activities	3-3
3.12	Determination of DQOs and Development of Quality Assurance Project Plans	3-3
3.13	Preparation of Quantitative Models	3-4
3.14	Preparation of Standard Operating Procedures (SOPs)	3-4
Section 4. Evaluation and Improvement Activities.....		4-1
4.1	Corrective and Preventive Action	4-1
4.2	Quality Assurance Assessment	4-1

1. Quality Management System

Blasland, Bouck & Lee, Inc. (BBL) and its affiliated companies (collectively, the “Firm”) have established a Quality Management System that promotes continuous improvement in the quality of our services. As such, the Firm has established a Quality Management System through which critical-to-quality needs are defined, appropriate resources and personnel are applied, effective procedures are implemented, and other processes for continuous improvement are planned, executed, evaluated, and improved, as needed. Through the effective application of our Quality Management System, the Firm strives to provide services that meet or exceed client expectations and regulatory requirements.

The purpose of this Quality Management Plan is to identify the scope of the Firm's Quality Management System and to describe how our processes, people, and resources interact within the system to continuously improve our services.

Collectively, the information and policies identified in this document are referred to as the Quality Management Plan (QMP). The purpose of this plan is to identify the scope of our Quality Management System, describe the sequence and interaction of the processes included in the Quality Management System, and identify the policies of our documented procedures. This QMP and associated processes define and communicate the necessary organizational functions and interrelations within the Firm, including responsibilities and authorities for implementing, monitoring, and enforcing our Quality Management System.

This QMP applies to the full range of activities performed by the Firm, whose employees are committed to providing quality services (e.g., reports, letters, work plans, designs and specifications, advice and opinions, data) to our clients. Many of the Firm's activities involve collecting and evaluating data; designing, constructing, and operating systems; and providing management consulting services. The activities that affect quality must consistently meet the intended use, purpose, or scope of work; meet or exceed client expectations; comply with regulatory requirements; be conducted safely; and respect cost considerations.

Our Quality Management System is based upon the core principles of continuous improvement and is guided by national and international standards, including but not limited to:

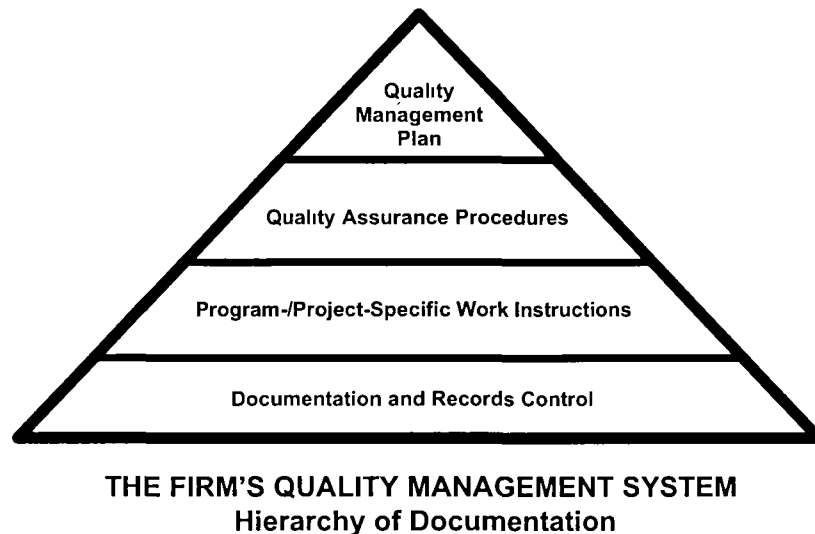
- USEPA QA/R2 – Requirement for Quality Management Plans;
- ANSI/ASQ E-4 – National Standard for Environmental Management Systems; and
- ISO 9001:2000 – International Standard for Quality Management Systems.

1.1 Continuous Improvement

At the heart of our Quality Management System is our Continuous Improvement Process (CIP), a mechanism to achieve continuous improvement in all of the Firm's services. This process permeates every aspect of our Quality Management System as we strive to fulfill all of the Quality Principles under the Firm's Quality Policy. Our CIP involves four primary stages:

- **Planning** activities, designed to identify the processes needed to provide services and produce deliverables, and to determine the sequence and interaction of these processes;
- **Execution** methods provide effective control of these processes and the information necessary to support the work activities;
- **Evaluation** methods measure, monitor, and analyze these processes; and
- **Improvement** activities implement actions to achieve planned results or improve processes in an effort to sustain continuous improvement.

1.2 Documentation of the Quality Management System



- **Quality Management Plan** – Occupying the top of the pyramid is this QMP, which declares a core set of policies, procedures, and management responsibilities for developing, executing, and monitoring the Quality Management System as it is applied across the Firm's entire collection of services. This QMP is a living document and reflects the current quality program approach undertaken by the Firm. The Corporate Quality Manager (CQM) is directed by the Corporate Quality Officer (CQO) to prepare, regularly assess, and update this plan to reflect ongoing changes and improvements based upon the Firm's continuous improvement efforts. Senior-level managers of the Firm are ultimately accountable for this plan, mission accomplishment, and ensuring that the QMP satisfies all US Environmental Protection Agency (USEPA) policy requirements. The CQM, CQO, Legal Counsel, President, and Chief Executive Officer are responsible for approval of the QMP.
- **Quality Assurance Procedures** – Based on the type of services and guided by the Firm's Quality Policy and Quality Principles, the next tier in the system comprises the quality assurance procedures (QPs). The QPs set forth specific policies and requirements for those common processes identified as having the most significant impact on the quality of our Firm's services. They are designed to inform and instruct employees, and are designed to meet USEPA's QA/R-2 requirements. Selecting appropriate and applicable QPs is a management function, resulting in activities that are of the type and quality needed and expected by our clients. QPs are maintained in a central file on the corporate Intranet and are made readily available to all employees.

The Firm's Quality Assurance Procedures provide "best practice" guidance and are designed to meet EPA QA/R-2 requirements.

Refer to QP 1 01 for information regarding the control of QPs

- **Work Instructions and Standard Operating Procedures** – The next tier in the system focuses on the project- and program-specific work instructions that promote and guide the delivery of quality services to our clients. These detailed instructions and standard operating procedures (SOPs) are developed and managed both at a corporate level and project-, program-, or client-specific level. Through these detailed

work instructions, the Quality Management System accommodates the wide array of the Firm's services and the equally wide variety of circumstances under which those services are delivered. In this way, the system remains consistent yet flexible for program-, project-, and client-specific activities (procedures and work instructions) that are applicable to each work effort.

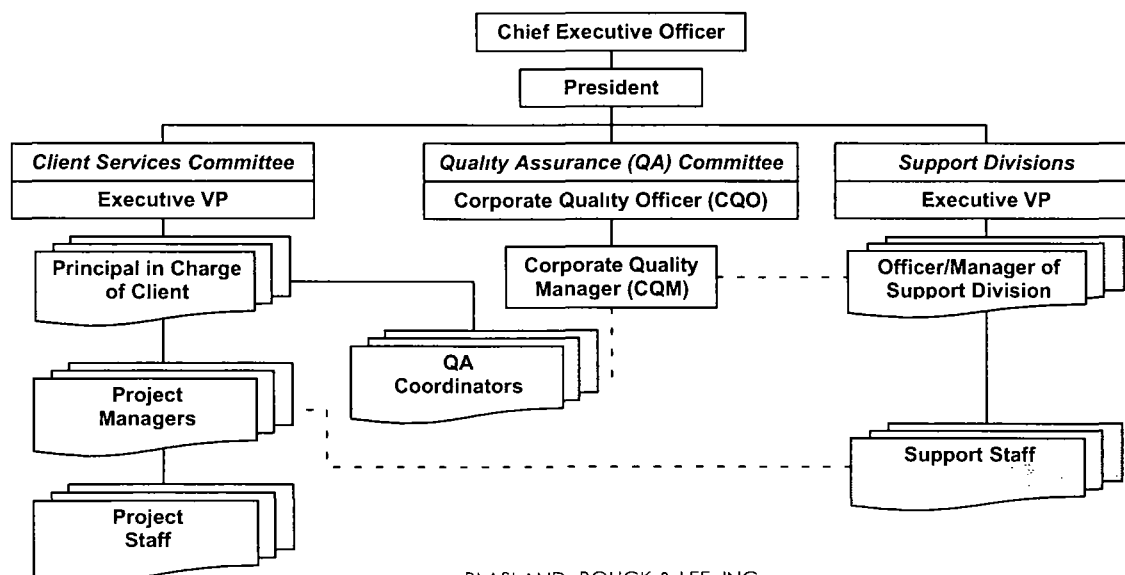
- **Documentation and Records Control** – Finally, the Quality Management System is grounded in specific methods and responsibilities for documenting all aspects of the program, including a document and record management procedure. Documented procedures are approved and updated by appropriate personnel, as necessary, prior to issuance. The current revision status of each document is identified, relevant versions of applicable documents are available at points of use, and all documentation remains legible, readily identifiable, and retrievable. Measures are in place to prevent the unintended use of obsolete documents and to suitably identify them if they are retained for any purpose. Documents of external origin are identified, and their distribution is controlled. Records required for the Quality Management System are maintained to provide evidence of conformance to requirements, as well as evidence of effective operation of the Quality Management System.

Refer to QP 1.02 for more information on documentation and records management.

1.3 Management Responsibility and Commitment

The Firm's management is committed to implementing and improving the Quality Management System. This is demonstrated by setting an example and communicating the importance of meeting client, regulatory, and legal requirements. It is management's responsibility to maintain an atmosphere in which all employees strive to provide quality services and continuously improve. Although managers at the corporate, divisional, and project levels lead the implementation of the Quality Management System, quality is the responsibility of all employees. The management and all employees of the Firm work as a team to build quality into every project and to deliver the unparalleled services our clients expect. As needed and appropriate under this QMP, senior management delegates authority and independence to management personnel and staff, and provides measures to verify that the Quality Management System is understood and implemented by all levels of employees.

Although management provides leadership in implementing the Quality Management System, quality improvement is the responsibility of all employees of the Firm.



BLASLAND, BOUCK & LEE, INC

- **Organization** – The abbreviated corporate organizational chart (above) illustrates the senior management positions responsible for the Firm's Quality Program, including the role of the CQO. The Firm's CQO and CQM have the responsibility for overseeing and verifying that processes of the Quality Management System are established and maintained. The CQO and CQM report to senior management on the performance of the Quality Management System and the needs for improvement. The CQO, CQM, and senior management are responsible for promoting awareness of quality requirements throughout the Firm.
- **Management Review** – Working closely with the CQO and CQM, the Firm's senior managers regularly assesses the adequacy of the Quality Management System, identify appropriate actions resulting from these assessments, and verify that corrective actions are completed in a timely manner. Factors that hinder the Firm from meeting quality objectives are identified and corrected in a timely manner. For example, at least once each year (or more frequently, as deemed necessary by senior management) the Quality Management System and this QMP are reviewed and appropriately updated to reflect changes in the Firm, as well as changes in policies and procedures.

Refer to Section 4.2 of this QMP and QP 4.05 for the procedural aspects of management review

- **Roles and Responsibilities** – The following table briefly summarizes the key quality-related roles and responsibilities of management and staff in implementing the Quality Management System

Summary of Roles and Responsibilities	
Personnel	Primary Role in Quality Management System
Senior Management	Accountable to clients, the Firm's Board of Directors, staff, and shareholders. Responsible for promoting, executing, and performing management review of all policies identified in this QMP.
Corporate Quality Officer	Accountable to senior management. Responsible for guiding the Firm in the development, execution, and improvement activities associated with this QMP.
Corporate Quality Manager	Accountable to the Corporate Quality Officer. Responsible for managing the Firm's efforts in the execution of this QMP.
Quality Assurance Coordinator	Accountable to the appropriate Principal-in-Charge (PIC). Responsible for acting as liaison between the CQM/CQO and the client-specific activities that he/she is responsible for.
Principal-in-Charge (PIC) of Client	Accountable to the client and senior management. Responsible for promoting and executing appropriate and applicable processes identified within this QMP.
Project Manager (PM)	Accountable to the PIC. Responsible for understanding all processes identified in this QMP, for identifying all applicable processes for use on his/her project, and for communicating and verifying that all project team personnel are following documented processes.
Staff	Accountable to the Project Manager and individual supervisor. Responsible for performing activities in accordance with stated processes identified within this QMP.

The Firm's senior managers are committed to providing the resources required for the effective planning, execution, evaluation, and improvement of services and work procedures under our Quality Management System. Such critical-to-quality resources include, but are not limited to, human resources, training, and facilities, as described below:

- **Human Resources** – It is the Firm's policy that personnel be qualified to implement the work activities to which they are assigned. Objective evidence of qualifications is established, maintained, and evaluated. Personnel who are assigned responsibilities defined in the Quality Management System are competent on the basis of applicable education, training, skills, professional licensing, and experience. A performance evaluation is performed annually for all staff. Managers are responsible for continually identifying additional skills needed by personnel performing activities affecting quality. Education and/or training are provided to fulfill these needs, and the effectiveness of this training is evaluated by management. Supporting feedback is provided from appropriate project management personnel. Managers are also responsible for identifying retraining needed for their personnel. Appropriate education, experience, training, licensing, and qualification records are maintained.

Refer to QP 1.03 for information regarding the resource coordination process

- **Education/Training** – It is the Firm's policy to provide the education and training needed by each employee to perform his/her work activities, and to encourage all employees to actively participate in career-building education and training programs. This is achieved by providing a balanced, continuously improving, and interactive education and training program for all employees to enhance personal growth, technical knowledge, and client focus.

Training needs are identified through individual competency evaluations. These needs are addressed through corporate-directed programs. The Firm requires specific levels of training and education for each employee depending on his/her position and role. Quality-specific training for employees is provided annually. After completing the training, employees are required to complete an evaluation to assess the relevance and effectiveness of the training. Education and training records are maintained for each employee.

Refer to QP 1.04 for information regarding education and training.

- **Facilities** – Human and physical factors of the work environment, including workspace, associated facilities, equipment, hardware, software, and supporting services, are identified, provided, and maintained to promote quality services and the continuous improvement of those services.

2. Planning Activities

Planning activities begin with identifying client requirements and establishing quality objectives for these requirements. Additional activities include identifying applicable QPs (or the need to develop one or more new QPs) and providing the resources and facilities specific to client requirements.

Applicable QPs identify the processes needed to meet or exceed client requirements, and to review, verify, and validate the activities appropriate to each design and/or development stage, as well as the responsibilities and authorities for these activities. Interaction between different groups involved in planning, design, and development is actively managed to promote the effective communication and understanding of responsibilities. As activities progress, planning activities are updated as part of the CIP.

Our ability to meet and exceed client expectations is dependent upon successfully planning and executing projects. Project planning develops the concept and approach, identifies the client's quality requirements, and provides for continuous improvement through monitoring and evaluation throughout all phases of the project's life.

The Firm's *Project Management Handbook* provides a number of essential tools that aid successful project planning and implementation. Coupled with the Client Quality Plan (CQP), the *Project Management Handbook* is intended to facilitate the consistent application of good planning, execution, evaluation, and improvement practices according to this QMP and associated QPs.

2.1 Project Planning

It is the Firm's policy to successfully plan and execute each and every project, enabling us to meet or exceed our clients' expectations. Projects are planned to facilitate efficient project implementation (from the development of concept and approach through project completion) and to identify the client quality requirements for the proposed work. Each project is monitored for changing conditions throughout all phases of the project and is periodically reviewed to determine whether appropriate steps have been taken to meet project goals and to evaluate the effect of any changes or nonconformances.

Refer to the Project Manager's Handbook and QP 2 01 for information on project planning

2.2 Procurement of Products and Services

It is the Firm's policy to plan for and then procure all of the goods and services required to conduct our business activities in accordance with fair, ethical, and legal trade practices. Based on sound planning and project management, goods and services are procured when and where needed, in and of the desired quantity and quality, at the lowest possible price, via the most economical shipping methods, and by personnel authorized to execute procurements on behalf of the Firm.

Refer to QP 2 02 for information regarding procurement requirements

2.3 Control of Changes

It is the Firm's policy that project and scope changes are identified, documented, and controlled; affected personnel are informed; and an evaluation is performed on the effect of the changes on the services provided. The changes are verified and validated, as appropriate, and approved before implementation (approvals for emergency situations will be performed in a reasonable period of time). Results of the review of changes and subsequent follow-up actions are documented.

Refer to the Project Manager's Handbook and QP 2 01 for guidance on controlling project-related changes.

2.4 Control of Measuring, Testing, and Monitoring Devices

It is the Firm's policy that equipment used by the Firm is in the condition required to perform specified activities, maximizing the quality (i.e., accuracy, precision, usefulness) of data collected from these devices. Under the Firm's Quality Management System and according to applicable project-specific Field Sampling Plans (FSPs) and/or Quality Assurance Project Plans (QAPPs), measurements and the measuring, testing, and monitoring devices required for verifying conformity to specified requirements are identified.

Refer to QP 2.04 for information on measuring, testing, and monitoring devices.

2.5 Development of Client Quality Plans

It is the Firm's policy that effective client-focused planning is essential for meeting or exceeding the quality expectations of our clients. As appropriate for the specific needs of the client, the PIC identifies and establishes quality measurements and monitors the most significant client expectations. Each CQP is considered a "living" document and is designed to allow adaptation to changing client requirements and expectations

Refer to QP 2 05 for information on the content and role of the CQP.

2.6 Proposal Development Process

It is the Firm's policy that all proposal and qualification documents produced by the Firm accurately represent the Firm's ability to provide services that meet or exceed our clients' expectations and that meet applicable regulatory requirements in accordance with the cost expectations of the client.

- *Refer to QP 2 06 for information on proposal development.*

2.7 Computer Information Technology

It is the Firm's policy that all computer hardware and software used for environmental programs undergo a controlled process for acquisition, testing, installation, maintenance, and evaluation. The Firm employs various computer hardware components and software programs in managing its business and in managing and implementing client projects. The Firm's Computer Information Technology (CIT) division is responsible for all computer-related activities, including but not limited to servers, desktops, networks, applications, web technology, and telecommunications. It is the responsibility of the CIT division to test, install, maintain, and control technology hardware, software, and services used by staff.

Refer to QP 2 07 for information on computer information Technology and the management of computer hardware and software. For activities specific to data management, refer to QP 3.09

3. Execution Activities

Execution activities include the sequence of processes and sub-processes involved in providing services that meet or exceed client expectations. These activities are controlled through information that specifies the characteristics of the service and the availability of work instructions, where necessary. The services provided by the Firm are measured and reviewed at appropriate stages to verify that requirements are met. Evidence of conformity with the acceptance criteria is documented, and records indicate the authority responsible for release of services and/or deliverables. Services and/or deliverables are not released until all the specified activities have been satisfactorily completed, unless otherwise approved by the client.

Quality-related processes necessary for providing services to our clients are planned and managed. These “living” processes not only provide consistency, but also allow for continuous improvement within the framework of the Quality Management System.

- **Review/Verification of Services** – Technical reviews of services, designs, and/or documents are conducted to evaluate the ability to fulfill requirements and to identify problems and propose follow-up actions. Reviews are conducted by appropriate representatives independent of the discipline associated with the activity being reviewed. Results of reviews and subsequent follow-up actions are recorded. Action is taken to verify that the service provided meets the intended goals.
- **Validation of Services or Processes** – Validation confirms that the result of the service meets its intended use. When applicable, validation is completed prior to the delivery or implementation of the service. When this is impractical, partial validation is performed to the extent applicable. Results and subsequent follow-up actions are recorded. Applicable validation includes the qualification of processes, equipment, and personnel; use of defined methodologies and procedures; requirements for records; and re-validation.
- **Client Property** – Care of client property is exercised while such property is in the Firm’s control or use by identifying, verifying, protecting, and maintaining the client property provided for use or incorporation into a deliverable. This may include but is not limited to intellectual property or confidential information. Incidents during which client property is lost, damaged, or otherwise found to be unsuitable for use are recorded and reported to the client.

3.1 Technical Document Process

It is the Firm’s policy that all external documents must fulfill client and applicable regulatory requirements and be technically accurate and legally defensible. The technical document process comprises the specifications and procedures that enable project managers and project staff to plan, execute, evaluate, approve, deliver, and manage documents.

Refer to QP 3.01 for guidance on the technical document process and to the Document Standards Guide for information on proper document formatting and numbering

3.2 Development and Verification of Figures, Tables, and Logs

It is the Firm’s policy to produce high quality graphic representations of information. Figures, tables, and logs must fulfill client and regulatory requirements and are technically accurate and legally defensible.

Refer to QP 3.02 for information on developing and verifying figures, tables, and logs

3.3 Preparation of Calculations

It is the Firm's policy that calculations be documented to a degree that a technical peer who may not be familiar with the project can understand the methodology, assumptions, justification, and references used. The goal of the calculation process is to have a minimum of two technically qualified individuals agree that the information presented in the calculation is accurate and is documented in sufficient detail.

Refer to QP 3.03 for guidance on preparing and reviewing calculations

3.4 Requirements for Field Sampling Plans

It is the Firm's policy that Field Sampling Plans (FSPs) be technically sound and in compliance with applicable regulatory, legal, and contractual requirements. FSPs are prepared using a standard format, are consistent with site-specific project planning documents, and require the approval of the PM prior to implementation.

Refer to QP 3.04 for guidance on preparing and reviewing field sampling plans

3.5 Documentation of Field Activities

It is the Firm's policy that all field activities be documented to show compliance with projects plans, work plans, and contract terms and to serve as evidentiary records. Documentation of activities must be legible, organized, and complete. All fieldwork documentation includes, at a minimum, project title and number, identification of the specifics of each activity, including the name of the employee performing the activity, and the date and time of the activity.

Refer to QP 3.05 for information on documenting field activities

3.6 Field Sampling Activities

It is the Firm's policy that field sampling, measurements, and observations are conducted in accordance with approved site-specific planning documents. These activities are documented to provide an evidentiary record and to demonstrate that the activities have been performed properly. Applicable documents include work plans, the Quality Assurance Project Plan (QAPP), the Field Sampling Plan (FSP), applicable standard operating procedures (SOPs), the Health and Safety Plan (HASP), and other appropriate project documents associated with the sampling program.

Refer to QP 3.06 for information on requirements pertaining to sampling activities.

3.7 Construction Inspection and Observation Activities

It is the Firm's policy that construction inspection and observation services be performed in a manner that is focused on client needs while maintaining appropriate risk management.

Refer to QP 3.07 for information on construction inspection and observation activities

3.8 Development of Design Documents

It is the Firm's policy that all engineering design documents (e.g., engineering and design reports and letters, work plans, contract drawings, technical specifications, performance specifications, and pre-purchase specifications) produced by the Firm be developed under the guidance of and are signed by the state-licensed Engineer in Charge (EIC) for that discipline. The Firm's design projects are performed using appropriately skilled personnel in a "best-team" approach and are technically sound (as defined by the industry standard of care) and developed using the appropriate engineering standards and codes, meet the client's goals and objectives, and comply with all applicable local, regional, state, and federal requirements.

Refer to QP 3 08 for information on developing design documents

3.9 Data Management

It is the Firm's policy that data management activities follow a common process to establish, meet data quality objectives in compliance with client requirements, and comply with all applicable local, regional, state, and federal requirements. A typical project entails acquisition, interpretation, and management of data.

Refer to QP 3.09 for information on data management.

3.10 Design During Construction Activities

It is the Firm's policy that all engineering efforts during design and construction activities be technically sound, meet the client's requirements, comply with all applicable local, regional, state, and federal requirements, and maintain appropriate risk management.

Refer to QP 3 10 for information on design during construction activities.

3.11 Operation, Maintenance, and Monitoring Activities

It is the Firm's policy to provide our clients with operation, maintenance, and monitoring (OMM) services that comply with applicable regulatory requirements, are conducted safely, and are performed efficiently on a consistent basis. Our goal is to provide value-oriented solutions that provide cost savings, reduced liabilities, and other positive business outcomes for our clients

Refer to QP 3 11 for information on operation, maintenance, and monitoring activities

3.12 Determination of Data Quality Objectives and Development of Quality Assurance Project Plans

It is the Firm's policy that data quality objectives are determined for data collection activities in conformance with client requirements, and that quality assurance project plans (QAPPs) be prepared in conformance with applicable federal and state regulations and guidance. The standard QAPP format is consistent with USEPA requirements for QAPPs (EPA QA/R-5) and was developed in accordance with the USEPA guidance for QAPPs (EPA QA/G-5). Data collected or generated by other parties (e.g., data from another consultant or the USEPA) or data collected or generated for other purposes (e.g., data originally collected for site investigation being used as part of a risk assessment) also follows applicable USEPA guidance.

Refer to QP 3 12 for information on data quality objectives and quality assurance project plans

3.13 Preparation of Quantitative Models

It is the Firm's policy to develop useful and defensible quantitative models using commercially available and accepted modeling tools. These models are used as management and decision-making tools in all of the fields of practice in which the Firm performs numerical or quantitative modeling.

Refer to QP 3.13 for information on the preparation of quantitative models

3.14 Preparation of Standard Operating Procedures

It is the Firm's policy to develop standard operating procedures (SOPs) that are technically sound, detailed (usually in a step-by-step presentation), and in compliance with applicable regulatory, legal, and contractual requirements. SOPs are prepared using a standard format and require the approval of a technical expert and the Project Manager.

Refer to QP 3.14 for information on the preparation of standard operating procedures.

4. Evaluation and Improvement Activities

Processes necessary for the continuous improvement of the Quality Management System are planned and managed to identify and execute improvement opportunities. Nonconformities and/or services that do not conform to intended requirements are identified, controlled to prevent unintended use or delivery, and corrected. When nonconforming services are detected after delivery or after use has started, appropriate action is taken based on the consequences of the nonconformity. Proposed rectification of the nonconformance is reported to the client, end-user, regulatory body, and others, as appropriate.

Continuous Improvement is facilitated through the use of this Quality Management Plan, the Firm's Quality Policy and Principles, assessment results, corrective and preventive action, employee input, and management review.

4.1 Corrective and Preventive Action

It is the Firm's policy to take corrective action to eliminate any defect from our work activities, and to confirm that the action taken is appropriate to the impact of the problems encountered. Preventive action is taken to eliminate the causes of potential nonconformities to prevent occurrence. A QP exists for identifying nonconformities, determining the causes of nonconformity, evaluating the need for actions to verify that nonconformities do not recur, determining and implementing the corrective and/or preventive action needed, recording results of action taken, and reviewing the corrective and/or preventive action taken.

Refer to QP 4.01 for information on corrective and preventive action.

4.2 Quality Assurance Assessment

It is the Firm's policy to continuously evaluate and improve our Quality Management System. The Firm's evaluation process focuses on three significant areas: external assessments through the use of a Client Satisfaction Survey process; internal assessments composed of internal audits, mini-reviews, and self-assessments; and Quality Management System Assessment through a formal management review conducted at least annually. Assessments of programs, projects, and specific project activities are conducted by appropriate management personnel, individuals involved in the program, and individuals independent of the work.

- **External Assessment** – A client satisfaction survey process is performed annually to solicit client perceptions of the services that the Firm provides
- **Internal Assessment** – Internal assessment is used to verify that the service activities performed and provided to our clients conform to the intended purpose and requirements defined in the QMP and the related QPs. Three approaches are used to perform internal assessments: internal audits, mini-reviews, and self-assessments. The mini-review approach requires an assessor who has previously participated as an auditor and has successfully completed either an external (e.g., ISO 9001 Internal Auditor) or internal training program, provided by the CQM/CQO
- **Management Review** – The CQM/CQO annually provide senior management with the combined results of assessments. The activities and results of the Quality Management System are verified for the system's continuing suitability, adequacy, and effectiveness. The review evaluates the need for changes to the organization's Quality Management System, including the quality policy, quality objectives, and procedures. These reviews are recorded.

Refer to QP 4.05 for information on assessment activities

BBL	TOPIC		QUALITY PROCEDURES CONTROL	QP 1.01
	Revision B 04/02/03	SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED All

STATEMENT OF POLICY:

It is our Firm's policy that all procedures required for the Quality Management System are documented, controlled, and readily available for use. The Firm has identified the most significant processes that affect the quality of our services and has established standard Quality Assurance Procedures (QPs) designed to inform and instruct our staff.

1.0 Purpose

This QP is intended to guide all staff in the development and control of all QPs used by the Firm. This document has been created:

- to approve QPs for adequacy prior to issue;
- to review, update as necessary, and re-approve QPs;
- to identify current revision status of the QPs;
- to verify that relevant versions of applicable QPs are available at points of use;
- to provide legible, readily identifiable, and retrievable QPs; and
- to prevent the unintended use of obsolete QPs, and to apply suitable identification if they are retained for any purpose.

2.0 Responsibilities

Quality Assurance personnel are responsible for the implementation and control of this QP.

All staff are responsible for following this QP while performing development and review activities identified in this document.

The Quality Assurance Manager is responsible for identifying appropriate document editing needs of QPs and Quality Forms (QFs) and for approving any document editor's input.

3.0 Description of Procedure

The development of new QPs and the revision of current QPs follow an established process

3.1 Identification of Need

Our Firm continually strives to identify significant processes that require a QP and to refine existing QPs that affect the quality of our services.

3.1.1 New QP

A need is established for a new QP to guide the performance of a process. This need may be based upon a variety of factors, including common process, client needs, and quality assurance or legal considerations

3.1.2 Revision to existing QP

A need is established to revise an existing QP for improvement. This need may be based upon factors such as desired clarifications, procedural issues, or client needs

Process - Critical Components for the Control of Quality Procedures

- 1. Identification of Need:** to recognize that a procedure should be developed or revised in a consistent and controlled manner.
- 2. Communication of Need:** to inform and receive assistance from appropriate staff
- 3. Appropriate Resources:** to identify individuals who will assist in developing and reviewing new and existing QPs
- 4. Writing QPs:** to write a guidance document that is legible, accurate, and provides added value to a process
- 5. Routing Preparation:** to provide an efficient path for QP approval
- 6. Approval Process:** to perform an effective evaluation of the proposed QP
- 7. Revision Status:** to identify the current revision of a QP

BBL	<div> <div>TOPIC</div> <div>QUALITY PROCEDURES CONTROL</div> <div>QP 1.01</div> </div>
Revision B 04/02/03	<div> <div>SECTION</div> <div>Quality Assurance Procedure</div> <div>COMPANY LOCATIONS AFFECTED</div> <div>All</div> </div>

3.2 Communication of Need

The following Quality Assurance personnel may be contacted for assistance when developing or revising a QP. QA Officer or Manager, a designated Client Quality Assurance Coordinator, the current Procedure Champion, or any member of the Quality Assurance Committee.

3.3 Appropriate Resources

The use of appropriate personnel to assist in and add value to the development or revision of a QP is of paramount importance. The developed/revised QP will provide guidance and direction to all staff involved in performing the applicable process.

3.3.1 New QP:
The Quality Assurance Committee will designate an appropriate Champion to lead the efforts of the QP development and approval process. The Champion will give consideration to involving personnel in the effective development and review of the QP prior to submitting for approval.

3.3.2 Revision to existing QP:
The Champion will consider the nature and significance of the proposed revision when determining appropriate resources and their various levels of involvement.

3.4 Writing QPs

Our Firm applies a common format for documenting our key common processes. This approach provides consistency and common interpretation by all personnel affected by the QP.

3.4.1 New QP:
QF 1.01 01 is used as a template for the development of all new QPs.

3.4.2 Revision to existing QP:
The existing QP master file is used as the basis for all revisions and is located on the corporate Intranet.

As new or revised QPs are being developed, they shall be identified as "DRAFT" in the header of the document.

3.5 Routing Preparation

QF 1 01.02 is used for the approval process. The top section of the form should be completed by the author(s) of the new or revised QP. The form and the QP are then submitted to the Quality Assurance Manager (or Quality Assurance Officer) for insertion into the approval process and for selection of the appropriate QP or form category and identification number.

3.5.1 Identification of QPs and QFs

BBL	TOPIC		QUALITY PROCEDURES CONTROL	QP 1.01
	Revision B 04/02/03		SECTION Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED All

New and existing QPs will adhere to the following category patterns:

QP 1.XX	Firm-wide Quality System Requirements
QP 2.XX	Planning Activities
QP 3.XX	Implementation Activities
QP 4.XX	Review and Improvement Activities

New and existing QFs will adhere to the following format:

QF 1.XX.YY, where XX is the QP number and YY is the form number. It is the responsibility of the Quality Assurance Manager (or Officer) to assign these values.

3.6 Approval Process

QF 1.01.02 designates the appropriate approvals required for issuances of a QP. Identification of appropriate approval personnel will be controlled on the form. Once final approval is obtained, the "DRAFT" status indicated in the header is removed.

3.7 Revision Status

The current revision of each QP will be provided on the corporate Intranet. Revisions will advance alphabetically (i.e., A, B, C ... Z, AA, AB). Hard copies of any QP may be generated for use, but must be checked against the controlled version located on the Intranet to verify that the correct revision is being followed prior to performing activities. Obsolete revision hardcopies shall be either discarded or identified (stamped or hand-printed) in red ink as "obsolete" on each page of the QP.

4.0 **Related Forms**

QF 1.01.01	Template for Quality Assurance Procedures (QPs)
QF 1.01.02	Routing Form for New and Existing Quality Assurance Procedures (QPs)

- END OF PROCEDURE -

Chief Executive Officer
Authorization: _____

Date: _____

BBL	TOPIC <p style="text-align: center;">DOCUMENT AND RECORD MANAGEMENT</p> <p style="text-align: right;">QP 1.02</p>
Revision C (04/09/03)	SECTION Quality Assurance Procedure <div style="float: right;"> COMPANY LOCATIONS AFFECTED ALL </div>

STATEMENT OF POLICY:

It is BBL's policy to manage all documents in a manner that is consistent with all legal, contractual, and client-related requirements. These documents are managed in an efficient and cost-effective manner throughout each document's useful life cycle and in accordance with applicable law.

PURPOSE OF PROCEDURE:

The purpose of this procedure is to provide a common process for the management of all documents and records acquired or created by BBL.

PROCEDURE DESCRIPTION:

Document and record management includes the identification, numbering, filing, storage, retrieval, retention, disposition, and recovery of corporate documents and records.

This procedure pertains to documents and records in all formats, including paper, microfilm, magnetic tape, optical disk, and electronic files (including business- or project-related e-mail correspondence.) Please note: "Desk" or personal records are excluded from this procedure (see terms and definitions).

Corporate documents and records may be originated by BBL personnel, as well as by external entities, such as clients, other consultants, subcontractors, regulatory agencies, third-party benefit providers, insurance underwriters, claimants, leasing agents, utility service providers, property managers, or any of a number of other sources

Categories of documents that fall under this procedure include.

- Project;
- General Client and Marketing;
- Legal;
- Human Resources;
- Education and Training;
- Finance; and
- Other Vital Records.

Process - Critical Components For Effective Document Management

1. **Identification:** to recognize that a document or record will need to be managed and whether it should be considered to be a Privileged and Confidential document.
2. **Numbering:** to name an electronic file produced by BBL to facilitate tracking and retrieval.
3. **Filing:** to identify, protect, duplicate, and maintain BBL's vital records
4. **Storage, Retrieval, and Retention:** to remove inactive records from office areas and secure them in economical, and conveniently located, off-site storage locations. To document and communicate mandated or recommended document retention and disposal requirements in compliance with legal, fiscal, and administrative requirements and guidelines.
5. **Recovery:** to recover or reconstruct corrupted, damaged, lost, stolen or accidentally destroyed documents or records.
6. **Disposition:** to document the destruction of obsolete records in compliance with legal, financial, and administrative requirements and guidelines.

1. Identification

Whenever a document or record is generated or received, it must be determined whether or not it should be managed and whether or not the document is considered "Privileged and Confidential." Further information/clarification regarding "Privileged and Confidential" documents may be found within the contract, Client Quality Plan, or specific Project Plans, or be obtained from a client-team management member or the Legal Division. All documents designated "Privileged and Confidential" shall be clearly marked as such. If it is determined that the document or record should be managed, this Quality Procedure must be followed through the life of the document.

BBL	<div>TOPIC</div> <div>DOCUMENT AND RECORD MANAGEMENT</div> <div>QP 1.02</div>
Revision C (04/09/03)	<div>SECTION</div> <div>Quality Assurance Procedure</div> <div>COMPANY LOCATIONS AFFECTED</div> <div>ALL</div>

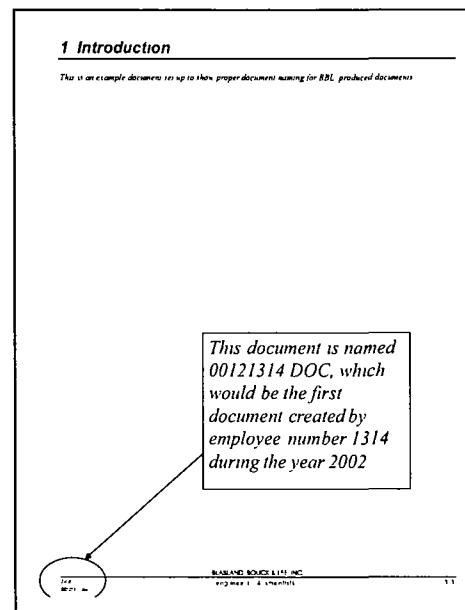
When an externally originated document(s) is received, including documents received by facsimile, the document(s) must be clearly marked or stamped as "RECEIVED" and must be dated prior to filing. Original documents that should not be stamped on the front page may be stamped on the reverse side (A "RECEIVED" stamp is available through your AA/ES.)

2. Numbering

All computer generated documents produced by BBL (e.g., correspondence, memos, reports, proposals, qualifications, specifications, tables, agreements, work plans) must reflect a file number and date in the document footer. Please refer to BBL's *Document Standards Guide* (refer to the corporate Intranet) for details on document numbering.

3. Filing

Project-related documents must be maintained by the office and owning division that manages the project. Original copies of all other business-related documents and records must be forwarded to the Management Services Group responsible for the coordination of such business activity. It is BBL's intent that a document management standard be applied to all corporate documents and records to permit efficient file retrieval, to easily consolidate records, and to facilitate the verification of this procedure through audits and self-assessments.



The location and organization of all retained corporate documents and records within any given file system shall be clearly displayed and obvious to all potential users. File reference lists shall be developed to identify corporate documents and records retained at each on-site and off-site location. The owning division must maintain the master copies of all documents. The division AA/ES or Records Clerk shall update these record inventory reference lists immediately upon any changes to the list. File inventory reference lists shall be kept at the beginning of the file to facilitate the retrieval of documents and records. Information on project-related material stored elsewhere must be included with the file system inventory list. In addition, file cabinet drawers and other record storage containers must be labeled in sufficient detail to identify file contents.

All e-mail correspondence must be controlled and maintained based upon at least one of the following approaches:

- Personnel are to control e-mail in client- or project-specific electronic folders within each user's e-mail tool;
- Controlled in an alternate location as directed and documented by the appropriate Project Manager; or
- As specified by the Client

A. Project Files

Client project files and associated documents must be maintained by the project's owning division and organized according to the corporate filing system outlined below.

- Files should be obtained from or returned to the AA/ES of the owning division for that project. All support divisions must send a copy of all incoming or outgoing documents (e.g., correspondence, memos, reports, drawings, invoices, agreements) to the AA/ES of the owning division for the purpose of maintaining a complete permanent record
- Documents should be filed in chronological order, with the most current document in the front of the file.

BBL	TOPIC	
	DOCUMENT AND RECORD MANAGEMENT	
Revision C (04/09/03)	SECTION	COMPANY LOCATIONS AFFECTED
	Quality Assurance Procedure	ALL

File Folders: File folders should be created for every project, and labeled according to the 12 types of standard files listed below. A file label template (in Microsoft Word) to facilitate the proper labeling of these files is available on the corporate Intranet. After these file folders have been created, any number of file folders can be added, depending upon the requirements of the particular project

Large computer output (such as boxes of analytical data or drawings) may be stored outside the project file, but the project file index must reference the existence and location of the computer output.

The 12 standard files are named and numbered as follows

File Number	File Name	Sample Contents
#1	Agreements/Proposals	Subcontractor Agreements, Client Contracts, PA Forms, Proposals, Letter Proposals
#2	Change Orders/Purchase Orders	Change Orders, POs, Work Variances
#3	Invoices	BBL-Produced Invoices, Invoice Cover Letters, Subcontractor Invoices
#4	Project Management	Project Plan, Organizational Charts, Team Directories, Mailing Lists, Project Schedules, Calendars, etc
#5	Correspondence	BBL-produced Letters, Agency Letters, Client Correspondence, Subcontractor Correspondence, BBL-Produced Memos, Other Memos, Meeting Minutes, Agendas, Phone Logs, E-Mails, Conversation Records, etc
#6	Notes and Data	Daily Logs, Field Notes, Site Photographs, Analytical Data and Tables, Drawings, Blue Prints, Modeling Data, GIS Output, Surveying Info, etc
#7	Public Relations Information	Newspaper Clippings, Press Releases, Community Newsletters, Web Articles
#8	Regulatory Documents	Permit Applications, Permits, Records of Decision (RODs), Consent Decrees, Administrative Orders of Consent (AOCs), Unilateral Administrative Orders (UAOs), Statements of Work (SOWs), Federal Registers, etc
#9	Marketing Documents	Marketing Brochures, Marketing Letters, Qualifications, etc
#10	Final Reports/Presentations	Final Reports and Presentations produced by BBL
#11	Draft Reports/Presentations	Draft Reports and Presentations (works in progress) produced by BBL
#12	Documents Prepared by Others	Draft and Final Reports, Presentations, and other Documents produced by another organization, such as Agencies, Clients, Subcontractors, other Consultants, etc

Deviations from the Standard Filing System: Deviations from the standard filing system outlined above are allowed to meet client and/or legal requirements. Deviations must be approved by the project management team and the Legal Division, documented, posted on the file cabinets where these files are stored, and communicated to the Records Officer.

File Labels: A template (in Microsoft Word) is available on the corporate Intranet for use when generating file labels for this enhanced filing system. Below is an example of what the file label would look like:

Client – Site Name	Client Project Number
#1 Agreements/Proposals	Range of Date(s)

BBL	TOPIC	
	DOCUMENT AND RECORD MANAGEMENT	QP 1.02
Revision C (04/09/03)	SECTION Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED ALL

For GES-Dekalb (client and project #0201.30186), the file label for the #1 file folder would look like this

GES – Dekalb	0201.30186
#1 Agreements/Proposals	10/99 – 1/01

Labeling File Cabinets: File cabinets and other storage containers used to house technical project files must be labeled in sufficient detail to identify file contents (please see example below). A file to help produce labels for file cabinet drawers (in Microsoft Word) is available on the corporate Intranet. Contact your division AA/ES for assistance in obtaining or using this file

Client – Site Name	Client.Project Number
Client – Site Name	Client.Project Number
Client – Site Name	Client.Project Number
Client – Site Name	Client Project Number
Etc	

An example of a file drawer label would look like this:

GES –Talbot Falls	0100.01015
GES – Fletcher	0100.01001
GES – DeKalb	0201 30186
Etc.	

When obtaining files, refer to section 4 of this procedure – Record Retrieval.

B. General Client and Marketing Files

BBL frequently gathers various marketing documents and other general client documents for a specific project even before the project is awarded to BBL. In these cases, if no project number has been established for the potential project, the Marketing Communication Specialist will set up a marketing file to house marketing and other documents pertaining to the potential opportunity. Once the project has been awarded to BBL and a project number has been established, marketing and other documents pertaining to the project should be stored in file #9, as described above. These documents should be maintained by the lead division and placed in the client project files. When a project is not awarded, these marketing documents should remain in the marketing file.

Documents created by the Corporate Development Division are tracked electronically. A unique STEM number is assigned to each new proposal or project initiated within the Corporate Development Division. The STEM number comprises an eight-digit or longer file name and a three-digit suffix. The first eight digits of the STEM number follow the format defined in BBL's *Document Standards Guide*. The series of alpha-numeric characters immediately following the first eight digits of the STEM number identify the type of document being stored (e.g., "CVR" represents a cover, "TOC" a table of contents, "x1" is Section 1). The three-digit suffix identifies the software used to create the document. A current list of marketing document identifiers is available by contacting the Corporate Development Division. Access to the Corporate Development Division's on-line scheduling and tracking system is required to ascertain client identity by STEM number. Contact the Corporate Development Division for assistance.

BBL	TOPIC.	
	DOCUMENT AND RECORD MANAGEMENT	
Revision C (04/09/03)	SECTION	COMPANY LOCATIONS
	Quality Assurance Procedure	AFFECTED
		ALL

C. Legal Files

The Legal Division generates and maintains corporate documents and records related to acquisitions, mergers, divestitures, corporate formations, contracts, real estate transactions, insurance, licensing, litigation and collection, legal research, conflicts of interest, and certain employee- or personnel-related documents or records. Records are organized as follows, with access restricted to a “need to know” or “limit of authority” basis.

Type of Document/Records	File Color	Filing Procedure
Administrative & Legal Research	Brown w/Red Labels	Alphabetically by Subject Matter
Client Contracts/Subcontracts/ Other Purchases	Blue, Orange denotes Master Agreement	Alphabetically by Seller
Conflicts of Interest	Gray	Alphabetically by Client Name
Corporate Secretarial Formations/Acquisitions/ Mergers/Divestitures	Yellow	Alphabetically by Legal Entity Name
Forms	Brown w/Green Labels	Alphabetically by Subject Matter, sub-filed by Form Name
Insurance	Purple	Alphabetically by type of policy coverage, segregated by Primary Named Insured, and sub-filed by current policy, expiring policy, correspondence, loss runs, and claims, with additional sub-files assigned as needed All original bonds are filed in the Vault Bond documents are filed by record category and sub-filed, in alphabetical order, by surety
Licensing	Pink	Alphabetically by State, sub-filed by BBL affiliate, sub-filed by type of license or registration, etc
Litigation/Collections	Green	Alphabetically by Person/Company/Entity Name
Personnel	White	Alphabetically by Employee's Last Name
Real Estate/Other Facilities related Transactions	Red	Alphabetically by State, sub-filed by City, sub-filed by Company

File label formats vary, based upon record category, and are on file within the Legal Division.

D. Human Resource Files

Employee records are filed alphabetically by the employee's last name.

- General files are red and include new hire information, required paperwork (e.g., BBL's Code of Ethical Business Practices Certifications), personal information (e.g., changes of address, copies of licenses, employment verifications), salary information and performance evaluations.
- Benefits files are blue and include medical, dental, flex spending and life insurance enrollment forms, 401(k) enrollment, beneficiary and change forms, and BBL-OPP beneficiary forms.
- Employee medical files, which include information on medical monitoring and personal medical information (e.g., disability paperwork) are in yellow files and are kept in separate drawers from general and benefits files.
- Benefit plan documents are filed alphabetically by provider. Provider billing statements and invoices are filed chronologically by billing period and plan year, within each provider file.
- Applicant records are filed by discipline and sub-filed by month received. Applicant records must be entered into the appropriate Human database module prior to archiving. Applicant records are retained as “Active” until entered into the database or for a period of 12 months, whichever occurs last. When an applicant is hired, applicant documents become part of the new employee's personnel file
- Terminated employee files are kept separate from active employee files (medical information files are still kept separate from the general and benefits files).

BBL	TOPIC	
	DOCUMENT AND RECORD MANAGEMENT	
Revision C (04/09/03)	SECTION	
	Quality Assurance Procedure	
	COMPANY LOCATIONS AFFECTED	
	ALL	

Human Resource (HR) files are confidential in nature and access is restricted to members of the HR Division. Applicant records may be accessed by contacting the recruitment group within the HR division. No duplicate sets of any personnel-related documents shall exist outside of the HR or Legal Divisions, other than:

- documents required to validate employee training or medical clearance as part of a fitness for duty certification;
- documents required to process payroll; and
- documents required to develop employee work experience as part of a corporate resume.

E. Education and Training Files

Records are filed alphabetically by employee last name into two separate files - Education or Training.

- Education and Training records are available on the corporate Intranet. These records are generated and automatically recorded when an individual requests an approval for education and/or training.
- Education and Training history is recorded in employee files in the Humanic database. Historical records are located in BBL's Education and Training files and are available by contacting a member of the division.
- Completion certificates and grades for Education courses are sent to the BBL Education & Training division to be filed into the individual's Education or Training folder.

F. Finance Files

BBL's accounting records are generally segregated into five distinct categories or functional areas: accounts payable, accounts receivable, payroll, employee and other miscellaneous reimbursements, and general business accounting. Filing procedures by document type or record are as follows, with access to "payroll" and "general business accounting" records restricted to a "need to know" or "limit of authority" basis.

Type of Document/Record	Filing Procedure
Accounts Payable	<ul style="list-style-type: none"> • Vendor payments are segregated by BBL affiliate, alphabetically by vendor BBL check stubs are attached to the front of the Vendor invoice prior to filing • Credit applications are filed alphabetically by vendor • Original Bonds are filed alphabetically by vendor, retained in the Vault until 1 year after completion of the Work or final payment, whichever is later
Accounts Receivable	<ul style="list-style-type: none"> • Numerical order by BBL project number, sub-filed by Agreement and invoices • Prime Contracts/Subcontractor Agreements are filed chronologically, by date of issue, in legal-size file folders Agreement sub-files are not archived until the project has been closed out • Client billings are also filed chronologically, by date of issue, in letter-size file folders, by fiscal year Current year and previous year Invoice files are retained as "Active "
Employee/Other Reimbursements	<ul style="list-style-type: none"> • Employee expense reports are filed alphabetically by employee last name, in chronological order by payroll period • Other reimbursements/ miscellaneous expense reconciliations are filed in chronological by accounting period • Cash advance forms are filed in chronological order by date of issue, sub-filed by month and fiscal year
Payroll	<ul style="list-style-type: none"> • Payroll registers are filed by Payroll Period, segregated by Fiscal Year, in three-ring binders • Vacation and bonus records are filed alphabetically by employee in three-ring binders Current year and previous year records are maintained as "Active " • Time sheets are filed alphabetically by the employee's last name, in chronological order by payroll period Current year and previous year records are maintained as "Active "
General Business Accounting	<p>Alphabetically, by type of record, in three-ring binders, in chronological order by accounting period, as follows</p> <ul style="list-style-type: none"> • A/R Adjustments, • Bank Accounts (by office, and chronologically by accounting period) • Bank Aging, • Bank Fees & Interest, • Cash Receipts (daily, by accounting period), • Daily Cash Receipts (DCR) LOC Backups, • ESOP Labor & Capital Loans, • Flex Checking, • GL Reconciliation (segregated by affiliate), • Health & Dental, • Regional Office Accounts (ROA), • Report & Funding, • Unapplied Cash Receipts, and, • Wire Transfers (alphabetically by Entity Name), Current year and previous year are retained as "Active "

G. Other Vital Records

Computer-aided drawings are filed electronically in accordance with CADD Document Management Procedures developed for and implemented by the CADD Division Access by users outside the CADD Division is restricted. Contact the CADD Division for additional information or help with locating a document. Other vital records, such as

BBL	TOPIC		
	DOCUMENT AND RECORD MANAGEMENT		QP 1.02
	Revision C (04/09/03)	SECTION Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED ALL

GIS/Modeling/Surveying documents, are managed within the division executing the work

4. Storage, Retrieval, and Retention

Storage and Maintenance Corporate documents and records are retained on-site in BBL's offices, and off-site at project sites, employee home offices (subject to Executive Vice President approval), and storage facilities (e.g., Iron Mountain). All corporate records and documents, regardless of where they are retained, are filed utilizing the standard filing systems described in this procedure. The most current and frequently used records are kept on-site in filing cabinets or other record storage areas. Records accessed less frequently than once per month may be sent to storage and retrieved, as needed. When boxed for off-site storage, these records must be segregated by category and record retention dates. Duplicate copies are to be discarded. Records that are frequently retrieved from off-site storage facilities may be restored to office file storage areas, space permitting, when necessary. Records must be stored in facilities that provide a suitable environment to prevent loss and minimize deterioration, tampering, or damage. Such facilities may have controlled access.

Records retained at off-site locations must be transferred to and integrated with the owning division's files upon completion of the field activity. An inventory of records, prepared in quadruplicate on BBL's Archived Records Inventory form (refer to the corporate Intranet or the Legal Division), must be transmitted with the records. Records must be adequately protected from damage and loss during transfer. If necessary, copies may be made prior to shipment. Filed records may be bound, placed in folders or binders, or otherwise secured.

Record Retrieval: For prompt retrieval of information, project records must be accessible for the period of time stated in BBL's Records Retention Schedule (refer to the corporate Intranet). Contact the appropriate divisional AA/ES when needing assistance. Sign-out sheets and "out cards" are maintained to track file removal and to assist in locating a file that has been removed from the file cabinet or other file storage unit. The sign-out sheet includes the project number (if applicable), borrower's name, title of file(s) removed, and the dates removed and returned. Out cards require insertion of similar information. Copies should be made if records are needed for an extended period of time.

Retention: Record storage times are determined by statute, contract, and regulatory requirements. Retention times may also be influenced by other considerations such as the intrinsic or historical value of the document or record. Detailed client retention requirements, when required, are documented in Client Quality Plans or Project Plans. **Please note that no final issue, BBL-generated, project document is to be destroyed without the General Counsel's approval. In the event of pending or threatened litigation, no files may be destroyed regardless of any client directive to the contrary.**

5. Recovery

Recovery or Restoration of Damaged, Stolen, or Destroyed Records: Corporate document or records may become corrupted, damaged, lost, stolen, or destroyed before their useful value to BBL has expired. There are many techniques available to restore, recover, or reconstruct this information. Fans or chemicals can be used to dry documents that have become water-soaked. Historical data that have been stored electronically can be reinstalled to recreate financial reports or CADD drawings destroyed by fire. Tape backups can be used to restore corrupted electronic files.

Document Recovery Assistance The Corporate Information Technologies (CIT) Division is available to assist personnel with the restoration or recovery of corrupted, damaged, lost, or destroyed documents or records stored on electronic, magnetic, optical, or any other type of computer media. The Legal Division is available to assist with, or coordinate the recovery or reconstruction of, damaged, lost, or destroyed paper documents and records that the CIT Division is not able to restore or recover, typically with the help of third-party vendors who specialize in forensic recovery of business records.

Reporting a Loss: Contact the Legal Division immediately when records are damaged or destroyed as the result of criminal mischief (e.g., computer hackers, disgruntled employee destruction of property) or real property damage (e.g., fire, flood). If

BBL	TOPIC		DOCUMENT AND RECORD MANAGEMENT	QP 1.02
	Revision C (04/09/03)	SECTION Quality Assurance Procedure		
			COMPANY LOCATIONS AFFECTED	ALL

warranted, police reports will be filed and a claim for cost recovery will be made against BBL's insurance carrier.

6. Disposition

The disposition of records is dictated by BBL's Records Retention Schedule, available on the corporate Intranet.

Destruction of Records: Follow the steps outlined below when destroying records

- 1.) Review the stored records inventory to identify records eligible for destruction.
- 2.) List the records on a Certificate of Records Destruction Authorization form (refer to the corporate Intranet) and obtain the necessary destruction approval signatures. Use a method of destruction appropriate to the records, such as shredding or burning. Non-confidential or non-sensitive records can be disposed of by recycling or through regular trash removal.
- 3.) Obtain certification from the employee or third-party organization that records have been destroyed, including the date and method of destruction.
- 4.) Establish a regular review and disposal of records, usually at the end of the calendar or fiscal year.

Documents and records in all formats, including paper, microfilm, optical disk, and electronic records, must be destroyed in compliance with this procedure.

Client Notification. Certain BBL clients require notification before any client-related documents are released or destroyed. Care should be taken to determine which requirements apply before releasing or destroying any project-related records. When required, the Legal Division shall develop and obtain fully executed client acknowledgements prior to the release or destruction of any client documents or records.

RESPONSIBILITIES:

		RESPONSIBILITY FOR CONTROL OF CORPORATE DOCUMENTS, BY TASK										ALL EMPLOYEES	LEGAL DIVISION	PRINCIPAL-IN-CHARGE	PROJECT MANAGER	GENERAL COUNSEL	DIVISION AA/ES/SEC.	CORP. RECORDS CLERK	RECORDS OFFICER	INFO. TECHNOLOGIES	LIBRARY RESOURCES
PROCESSING CONTROLLED DOCUMENTS/ RECORDS	Generate/Acquire Records to Document the Firm's Business Transactions and Project-Related Activities		X																		
	Identify, Validate, Index (Label), File, and Store Controlled Records		X																		
	Purge Obsolete or Superseded Documents Generated or Acquired		X																		
	Notify "Need To Know" Personnel of Such Obsolescence		X																		
POLICY DEVELOPMENT & IMPLEMENTATION	Develop and Update Records Retention Schedule(s)			X																	
	Promote Implementation of QP 1 02			X	X	X	X														
	Assess QP 1 02 for Compliance						X														
	Advise the Legal Division when Corporate Documents Are Discovered that are not Referenced in the Records Retention Schedule(s)											X					X				
	Develop, Approve and Disseminate Changes to File Indexing Systems														X			X			
DOCU MENT/ RECOR DS	Conduct Records Inventories or Surveys														X						
	Develop and Maintain Current File "Inventories"														X						
	Purge all Division Files no less frequently than Annually														X						

BBL	TOPIC			QP 1.02
	DOCUMENT AND RECORD MANAGEMENT			
Revision C (04/09/03)		SECTION	COMPANY LOCATIONS	
		Quality Assurance Procedure	AFFECTED	
			ALL	

	RESPONSIBILITY FOR CONTROL OF CORPORATE DOCUMENTS, BY TASK	ALL EMPLOYEES	LEGAL DIVISION	PRINCIPAL-IN-CHARGE	PROJECT MANAGER	GENERAL COUNSEL	DIVISION AA/ES/SEC.	CORP. RECORDS CLERK	RECORDS OFFICER	INFO. TECHNOLOGIES	LIBRARY RESOURCES
	Prepare Purged Files for Storage or Destruction						X				
INSURING CONTROLLED DOCUMENTS/ RECORDS	Report Location/Volume of All Archived Records to the Legal Division for Insurance Coverage Purposes						X				
	Obtain Insurance Coverage for Locations and Valuable Records Recovery		X								
	Report any Damage to or Destruction of Controlled Documents Resulting from Criminal Mischief or Real Property Damage (e.g., Fire, Flood, Theft) to the Legal Division	X									
	Report Such Document Loss to Police/Insurance Carrier(s)		X								
DOCUMENT STORAGE & RETRIEVAL	Coordinate Storage of Purged (Archived) Records						X	X			
	Retrieval of Archived (Stored) Records						X	X			
	Preparation of Controlled Document Retrieval /Return Form(s)	X									
	Off-Site Storage Vendor(s) "Point of Contact"							X			
	Preparation of Quarterly Divisional Storage Fee Invoices							X			
DOCUMENT RECOVERY	Assist Legal or Other Corporate Personnel with the Recovery of Damaged or Lost Documents						X	X			
	Assist with Restoration or Recovery of Corrupted, Damaged, Lost, or Destroyed Electronic Media Documents									X	
	Assist with Recovery or Restoration of Damaged, Lost, or Destroyed Paper Documents		X				X	X			
	Assist with Viewing or Recovery of Microfiche Documents										X
RETURN OF CLIENT FILES	Approve Return of Controlled Records to Client(s)		X	X							
	Prepare Controlled Documents for Shipment to Client(s)						X				
	Develop/Obtain Executed Copy of Client Records Release <u>Prior</u> to Release		X								
DOCUMENT DESTRUCTION	Initiate Records Destruction Process							X			
	Prepare Certificate of Records Destruction Authorization Form							X			
	Obtain Necessary Destruction Approval Signatures							X			
	Approve All Requests for Destruction of Controlled Documents					X					
	Obtain Client Releases Prior to Records Destruction		X								
	Maintain Original Copies of Certificate of Records Destruction Authorization Forms		X								

TERMS AND DEFINITIONS:

Active Records - Documents and materials frequently or regularly used to conduct business activities

Administrative or "Operational" Value - These records are necessary for the day-to-day business operations of your office. Do they establish policy or document operations? Administrative value is usually short-lived. Examples: correspondence, memos and reports

BBL	TOPIC		QP 1.02
	DOCUMENT AND RECORD MANAGEMENT		
	Revision C (04/09/03)	SECTION Quality Assurance Procedure	

“Desk” or Personal Records – Documents or records maintained by BBL personnel as reference materials, or for daily usage in the performance of duties for BBL, which do not contain information related to BBL’s business or project-related activities or those documents that quickly become obsolete, losing their retention value. These records may include employee-owned references or manuals, company-issued telephone directories, duplicate copies of BBL’s tiered client lists, pre-printed business forms, GL account lists, A/P vendor IDs, contractor license lists, or other similar types of documents that require frequent updates or do not otherwise meet the definition of a controlled document.

Document - Written or pictorial information that describes, defines, reports, specifies, or certifies activities, procedures, results, or requirements.

Draft - A document that has been reviewed and checked, and is considered a complete work product, but has not been issued by BBL or approved by the Client as the Final version.

“Fiscal” or Financial Value – These records document your office’s fiscal responsibilities, such as the receipt, payment, transfer, adjustment or encumbrance of corporate funds. They usually lose their value once an audit had been approved. However, records that establish or change fiscal policies will have a longer retention. Example: canceled checks, deposit slips, invoices, receipts, and purchase orders.

Historical Value - These records, which usually have a permanent retention, document the history of the government and the community, and constitute only a small percentage of the total volume of records in an organization. These historical, or archival, records contain significant information about persons, places, events, government or corporate organizations, etc. Historical records are valuable because of their age or rarity, such as records of the 18th and 19th centuries. Examples: corporate minutes, resolutions, policies, and annual reports.

Inactive Records - Documents and materials that are not accessed more than twice a year and whose retention requirements have not yet been met.

Legal Value - These records have a mandated retention period by statute or regulation, may be needed as evidence in litigation, or document the rights of citizens or obligations of government. Examples: leases, deeds, titles, contracts, franchises, and court case files.

Permanent Records - Records that have significance or long-term value, such as reports, as-built drawings, design specifications, and field records.

Preliminary - A document for which formal review activities have not been completed.

Records Clerk – Designee to serve as liaison between BBL staff and any third-party record storage facilities hired by BBL.

Records Series - A group or unit of related documents or information that are normally filed or kept together because they relate to a particular subject or function, result from the same activity, or document a particular transaction or activity. For example, correspondence, contracts, ordinances, fiscal vouchers, project files, resolutions, and time sheets.

Records Inventory - Also called a records survey. Data compiled on a form that describes the types of record groups or record series within a container, cabinet, or location. It includes information on the function of the records; their format, use, and volume; and location. An inventory is not a list of individual documents or folders.

Records Management - The administrative process of managing information from its creation or acquisition until its final disposition (i.e., destruction or preservation), preferably in an easily accessible format.

BBL	TOPIC	
	DOCUMENT AND RECORD MANAGEMENT	
Revision C (04/09/03)	SECTION	
	Quality Assurance Procedure	
		COMPANY LOCATIONS AFFECTED
		ALL

Records Officer – The designated member of the Legal Division assigned corporate responsibility for developing and maintaining Records Retention protocols, insuring records against loss, assisting with document recovery, and serving as the central repository for collecting and disseminating information regarding BBL’s document retention policies.

Records Retention Schedule - Guidelines that list record series and state what to do with the records—(e.g., how long to retain them, special maintenance instructions, and procedures for records disposal). Retention schedules reflect the length of time that records have administrative, legal, financial, or historical value. Schedules are based on legal and operational requirements, including laws enacted by local, state, or federal legislative bodies; rules and regulations imposed by government and regulatory agencies; the statute of limitations for legal recourse; and judicial or administrative opinions.

Vital Records - Information and materials essential for the continuous operation of an organization. Identifying these records ensures that, in the event of a disaster, the information can be accessed and business operations can resume or continue. Vital records do not necessarily have a permanent retention or historical value.

- END OF PROCEDURE -

Chief Executive Officer

Authorization: _____

Date: _____

BBL	<div> <div>TOPIC</div> <div>RESOURCE COORDINATION & QUALIFICATIONS PROCESS QP 1.03</div> </div>
DRAFT Revision A (01/11/05)	<div> <div>SECTION</div> <div>Quality Assurance Procedure</div> </div> <div>COMPANY LOCATIONS AFFECTED</div> <div>All</div>

DRAFT DOCUMENT – Please provide comments to the Corporate Quality Manager.

This draft document is intended to formalize the existing HR/Resource Development process into a Quality Assurance Procedure.

STATEMENT OF POLICY:

It is BBL's policy that personnel are qualified to implement the work activities to which they are assigned. Qualifications for work activities affecting our clients and the Firm's business needs are established and maintained, and objective evidence of qualifications is evaluated.

Purpose

This quality procedure (QP) provides a common process for identifying, selecting, acquiring, orienting, evaluating, and professionally growing/developing personnel that perform BBL business activities. This process includes.

- determining the need for personnel
- establishing qualifications for that need
- conducting an appropriate search (internal or external) for the candidate
 - internal resource search
 - external search for new hire
- selecting an appropriate candidate
- reviewing and obtaining required training and certifications for the selected individual
- orienting the selected individual
 - project or work activity indoctrination
 - identification of annual performance goals
 - transition of management personnel
 - new hire orientation
- executing work activities by the selected individual
- obtaining and providing for objective evidence of qualifications
 - continuous feedback
 - execution of annual performance review
- continuously improving
 - technical competency
 - professional development and career growth
 - licensing/registration or certification
 - educational opportunities
 - promotion process

The importance of the process cannot be understated, as it covers virtually all facets of an individual's employment life-cycle at BBL. The overriding process includes several sub-processes owned and facilitated by various management services groups and BBL Committees (e.g., Human Resources, Education and Training, Technical Management Committee). Each formal sub-process is identified within this procedure and appropriate information is provided on how to obtain this information

BBL	TOPIC		RESOURCE COORDINATION & QUALIFICATIONS PROCESS	QP 1.03
	DRAFT Revision A (01/11/05)	SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED All

Responsibilities

Principal in Charge (PIC) or Officer – Accountable for the implementation of this QP and for verifying that the Firm is diligent in fulfilling the requirements of this procedure.

Supervisor – Responsible for identifying the need and qualifications of a position, orientation and indoctrination of the employee into the appropriate position, monitoring the day to day work activities of the employee and providing continuous feedback, identifying training needs and professional growth plans, performing the annual performance review, and facilitating the annual goals of the employee.

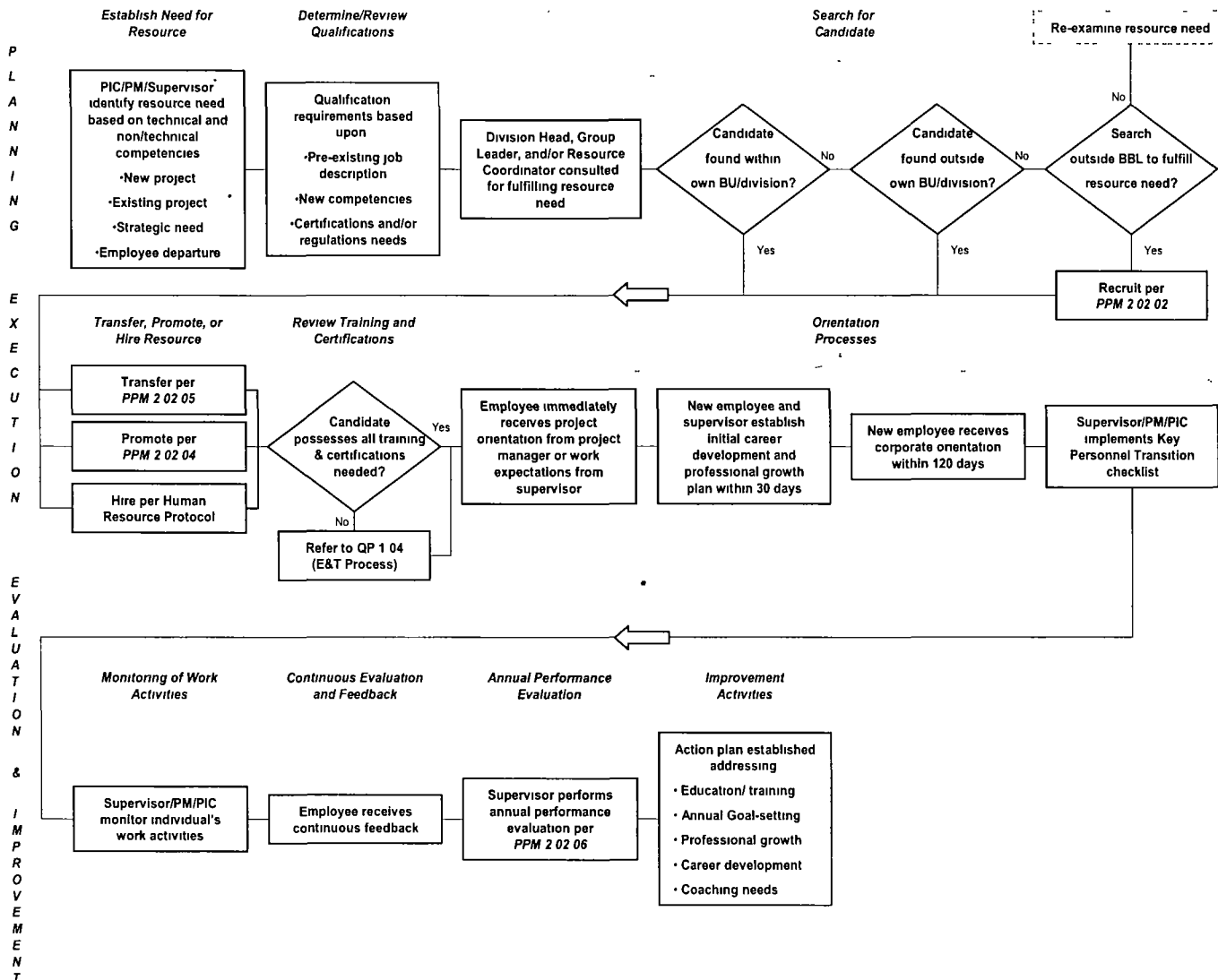
Resource Coordinator – Responsible for facilitating the match of resource needs of BBL to current or potential employees.

Project Manager (PM) – Responsible for identifying the need and qualifications of a project-related position, orientation and indoctrination of the employee into the appropriate position, monitoring the project activities of the employee and providing continuous feedback, identifying training needs, and providing feedback to the individual's supervisor at appropriate times.

DESCRIPTION OF PROCEDURE:

The common process of resource coordination is provided in the following flowchart

BBL	TOPIC		RESOURCE COORDINATION & QUALIFICATIONS PROCESS		QP 1.03
	DRAFT Revision A (01/11/05)		SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED
					All



1.0 Planning

Planning activities occur continuously over the course of each BBL project and supporting business units. The most significant personnel planning events occur during the inception and beginning stages of projects or when vacancies occur through normal business activities. Client management, including PICs and PMs, works in concert with appropriate Resource Coordinators and Group Leaders to identify the relevant skills, experience, and the responsibilities needed to achieve the goals established by our clients. Business Unit leaders and Management Services managers also work with the Human Resources division when non-project personnel are required for business activities.

BBL	TOPIC		RESOURCE COORDINATION & QUALIFICATIONS PROCESS		QP 1.03
	DRAFT Revision A (01/11/05)		SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED
					All

1.1 Identification of Resource Needs

1.2 Establishment/Confirmation of Qualifications

Upon the identification of resource needs and the establishment or confirmation of required qualifications, the next step in the process is to select an appropriate candidate for the desired project team or internal staffing need. Candidates are typically sought from within the business unit directly involved with the project activities. If no candidate is available, then contact is made with Group Leaders and Resource Coordinators from other business units. If no personnel are available from this effort, consideration is then given for hiring an individual from outside the Firm.

1.3 Resource Search

- Internal
- External
- Contingency planning

2.0 Execution

2.1 Acquisition of Candidate

- Transfer
- Promotion
- New Hire

2.2 Review of Training and Certification Requirements

2.3 Orientation to work activities

- Project or work activity indoctrination
- Annual Career Growth Plan and Goals
Within 30 days after the start of work, the supervisor will identify and communicate the goals expected of the new employee. These goals will be formally reviewed during the employee's annual performance evaluation.
- New Employee Orientation
- Key Personnel Transition Sub-process and Checklist
Frequently, circumstances will change based on project or corporate requirements, personnel moves, and new opportunities. The manager in responsible charge of the efforts at hand must provide a clear and concise transition plan with/for the new employee(s). The process identified in QF 1.03.01 is used to appropriately address the change in circumstances and effectively communicate the expectations of

BBL	TOPIC		RESOURCE COORDINATION & QUALIFICATIONS PROCESS	QP 1.03
	DRAFT Revision A (01/11/05)	SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED
				All

the activity onto the new individual.

3.0 Evaluation and Improvement

3.1 Monitoring of work activities

3.2 Continuous Feedback

Continuous feedback is paramount to the success of each individual, and to the Firm as a whole. Feedback reinforces expectations and demonstrates that the supervisor/employee relationship is healthy and progressive.

3.3 Annual Performance Evaluation

Employees receive informal performance evaluations throughout the term of their employment. Formal reviews are conducted annually and as necessary. Annual reviews are conducted on an employee's anniversary date unless the employee is a level 1-4. Level 1-4 employees receive their annual performance evaluation on or around January 1 of each year. Managers are encouraged to conduct the performance evaluation meeting within the month preceding the employee's anniversary date or review date.

The annual evaluation is a means for the employee and supervisor to.

- meet formally and discuss the past year's performance;
- validate the effectiveness of internal/external training as it relates to professional and career growth;
- measure performance and accomplishments against short-term (one year) and long-term goals (two to five years out);
- establish new performance goals and objectives;
- mutually agree on training needs consistent with Technical Management Committee (TMC) guidelines for professional competency and career growth;
- retool short term and long term goals; and
- validate any licensing, registration or certification needs or renewals consistent with TMC recommendations.

All performance appraisals require the review and approval of the divisional officer prior to being processed by Human Resources.

3.4 Improvement Activities and Professional Growth

3.5 Professional Growth

- Education and Training
- Licensing and Certifications
- Promotion Process

– END OF PROCEDURE –

Chief
Executive Authorization: _____

Date: _____

BBL	TOPIC			EDUCATION & TRAINING	QP 1.04
	Revision A (7/28/03)		SECTION		
			Quality Assurance Procedure	All	

STATEMENT OF POLICY:

It is BBL's policy to provide the education and training required by each employee to perform his/her work activities, and to encourage all employees to actively participate in career-building education and training programs. This is achieved by providing a balanced, continuously improving, and interactive education and training program for all employees to enhance personal growth, technical knowledge, and client focus.

Purpose

The objective of this quality procedure (QP) is to provide a common process for identifying and implementing the training activities used to address individual and group competencies for work related to environmental programs.

Responsibility

Project Manager (PM) – The Project Manager is responsible for the identification and verification of the project-related personnel training necessary for his/her project.

BBL Personnel – Each employee is required to follow this procedure.

Education and Training Division (E&T) – The E&T Division is responsible for providing education & training in accordance with this procedure

DESCRIPTION OF PROCEDURE:

1. Overview

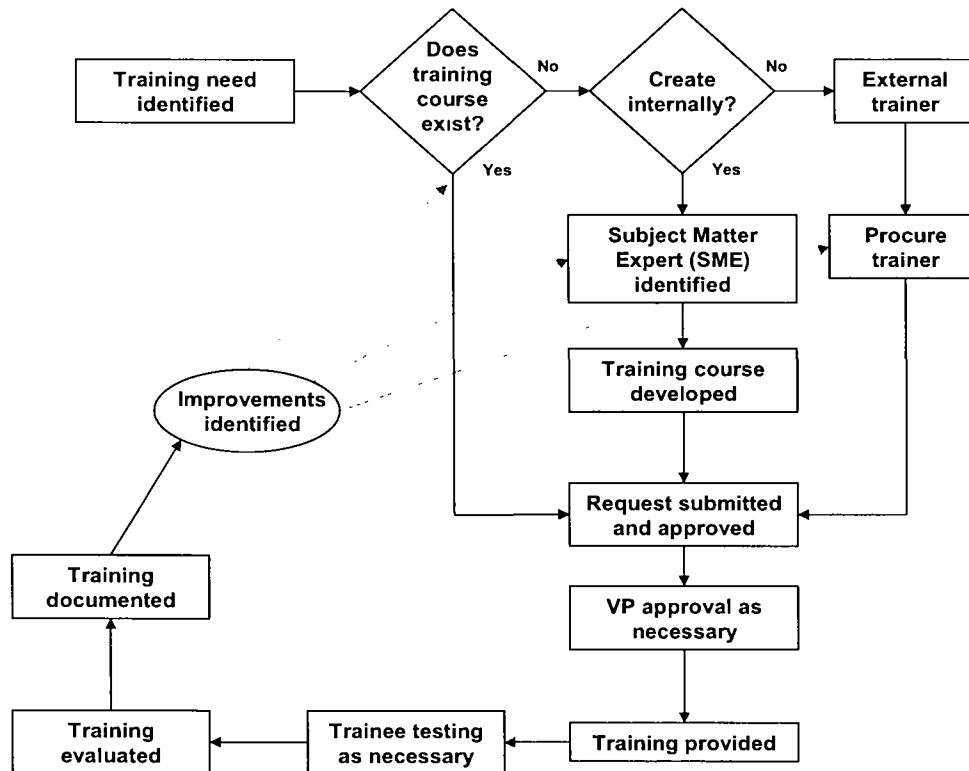
Education and training needs are identified through individual competency evaluations included in QP 1.03 – Resource Coordination Process, available on the corporate Intranet. To engage in training activities and events, employees submit a request for approval of an existing course or request that the E&T Division develop or obtain a new training course. After completion of the training, employees are required to complete an evaluation to assess the relevance and effectiveness of the training. Higher education opportunities are supported through the Firm's tuition reimbursement program, which applies to both degree/certificate programs and individual college-level courses. Education and training records are maintained for each employee.

The E&T Division responds to employee needs with an internal curriculum comprising, but not limited to, employee development, computer skills, health & safety, project management, executive education, and quality. These courses are available in a number of different delivery formats, including online, traditional classroom, self-study, video, and web conferencing, to accommodate employee needs throughout the organization.

2. Training Process

BBL	TOPIC		EDUCATION & TRAINING	QP 1.04
	Revision A (7/28/03)		SECTION Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED All

The process of identifying, developing, and providing education and training is depicted in the following flowchart



2.1 Identifying Training Needs

Training needs identified during normal business activities include

- technical and non-technical skills or information needed by an employee(s) to perform required work;
- retraining based on changing requirements (e.g., advances in technology, regulatory changes);
- refresher training based on internal/external requirements; and
- retraining based on employee needs.

2.2 Determining How the Training Program Will Be Provided

When training needs have been identified, a determination is made on how the training will be provided. This decision is based on the following options

- the training course currently exists and is available as part of BBL curriculum,
- training will be created and added to BBL curriculum by an internal Subject Matter Expert (SME). SMEs are personnel identified within BBL that possess in-depth knowledge of a given subject; or
- training will be outsourced to an external vendor, based on a statement of qualifications, interviews, and QP 2.02 – Procurement, available on the corporate Intranet

BBL	TOPIC			EDUCATION & TRAINING	QP 1.04
	Revision A (7/28/03)				
	SECTION			COMPANY LOCATIONS AFFECTED	All
	Quality Assurance Procedure				

Internal trainers (SMEs) at BBL are identified based on their knowledge and presentation skills. Communication and presentation skill training is available for internal trainers. The E&T division works with various SMEs and external vendors to verify that courses include current information and meet BBL standards of quality.

2.3 Request for Employee Training

When a training course is available, the employee submits an online Request/Approval Form to attend. This submittal is linked directly to the employee training/education tracking system. Requests are approved by the employee's officer, with the exception of self-improving courses (e.g., in-house lunchtime presentations, corporate-sponsored sessions), as determined by the E&T Division.

2.4 Implementation

The employee attends the training session and completes an online evaluation. This serves to verify that the employee completed the training and provides an assessment of the relevance and effectiveness of the training. When employees are tested on their knowledge and understanding of the materials presented during a training session, results are filed in employee training records. Available completion certificates are sent to the E&T Division and filed in individual employee training folders.

2.5 Documentation

An online database is maintained with training and education records for every employee, along with hard-copy employee training files for completion certificates and tests. These records are accessible to each individual employee, his/her supervisor and officer, the president, and the CEO. The E&T division maintains all database administrative rights. Files are also maintained for all internal BBL classes with sign-in sheets and completion (pass/fail) statistics.

2.6 Improvement

Training course assessment information is obtained and evaluated by the E&T Division following each training event. If the assessment is below average, the E&T Division will work with the employee to determine a suitable solution. Information is then communicated back to the provider of the training (e.g., Instructor, SME, outside vendor) so that improvements to content or delivery can be implemented.

- END OF PROCEDURE -

Chief Executive
Authorization: _____

Date: _____

BBL	<div> <div>TOPIC</div> <div>PROJECT PLANNING AND REVIEW</div> <div>QP 2.01</div> </div>
Revision B (12/19/02)	<div> <div>SECTION</div> <div>Quality Assurance Procedure</div> <div>COMPANY LOCATIONS AFFECTED</div> <div>All</div> </div>

STATEMENT OF POLICY:

It is BBL's policy to successfully plan and execute each and every project in a way that enables us to meet and/or exceed our client's expectations. Project planning facilitates efficient project implementation, from the development of concept and approach through project completion and the identification of client quality requirements for the proposed work. Projects are monitored for changing conditions throughout all phases of the project's life, and are reviewed to determine whether appropriate steps have been taken to meet project goals and to evaluate the effect(s) of any changes or nonconformances.

1.0 PURPOSE

The objective of this Project Planning and Review procedure is to provide a common process for project planning, execution, and implementation of changes. The project planning process is continuous and includes, but is not limited to, the development of project planning documents, risk management, completion of project reviews, project staffing (including identification of appropriate team members and reviewers), resource allocation, BBL and subcontractor contract execution, identification of changes in scope, completion of document and peer reviews, and completion of self-assessments

2.0 RESPONSIBILITIES

A. Principal in Charge

The Principal in Charge (PIC) is responsible for guiding Project Managers in the utilization of this procedure, determining project planning approval requirements, identifying the frequency of project self-assessments, and selecting appropriate peer reviewers. The PIC may delegate specific responsibilities to a Program Manager or Officer.

B. Project Manager

The Project Manager is responsible for the execution of this procedure.

C. Project and Support Staff

All project participants who are assigned to conduct, or participate in, project planning and review activities are responsible for complying with this procedure and any project planning documents.

DESCRIPTION OF PROCEDURE:

A. PROJECT PLANNING

Project planning is a continuous process of evaluating project needs based upon client expectations and requirements, legal and regulatory considerations, and sound business practices. It is imperative that the Project Manager consider the following when planning and implementing project activities:

- Client requirements and expectations
- Legal and regulatory requirements
- Scope of project
- Clear task management
- Communication planning
- Procurement of suitable subcontractors
- Application of applicable Quality Assurance Procedures
- Self-assessment activities
- Appropriate and timely document review
- Assignment of adequate, competent, and appropriately trained personnel

BBL	TOPIC		PROJECT PLANNING AND REVIEW	QP 2.01
	Revision B (12/19/02)	SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED All

Form QF2.01.01 is a 'living' tool and shall be used to document planning activities for all BBL projects that are expected to exceed \$25,000 in revenues. It is recommended that this project planning template also be used for lesser value projects. The form contains various key elements of sound project planning and is designed to help Project Managers execute an effective project, ultimately meeting client and BBL expectations. Form QF 2.01.01 key elements include.

Section	Description
Cover	Includes general information and revision control. The Principal in Charge, or designee, approves each revision.
A	Allows the Project Manager to identify BBL-related activities that are anticipated throughout the life of the project
B	Is used to state an overview of the project, including the overall purpose, a work scope summary, and key deliverables.
C	Is used in conjunction with the Client Quality Plan (QP 2 05) and states project-specific client expectations (including confidentiality requirements), goals and objectives based on these expectations, and the supporting metrics used
D	Addresses issues associated with Risk Management. The requirements include conflict checks, use of the Legal Review Request Form, a check of BBL/State Licenses, client financial review (compensation and D&B credit check), identification of contract number/MSA number/PO number and Agreement Date, Agreement/Authorization for Services, Patent Checks, and a Self-assessment Plan (QP 4.05)
E	Assists the Project Manager in the up-front identification of potential personnel resources. Those selected to perform work activities for the project should be notified as soon as possible
F	Establishes the Internal and External Communication plans to be used Includes specific client requirements and instructions, Client/Project Meetings schedule, email and eBBL communications/announcements, anticipated Work Product Distributions to the project team, and Communication Milestones (i.e., % Project Completion, % Budget Expenditure).
G	Describes the scope of specific tasks associated with the overall project, and identifies Task Manager(s), budget, specific work products/deliverables, schedule, and the identification of appropriate independent peer, technical, and/or editorial reviewers. Those selected to perform reviews should be notified of their planned participation as soon as possible.
H	Addresses the effective use of subcontractors and consultants. Information in this section includes the subcontractor's name and address, the location where the subcontractor's work will be performed, a description of the subcontractor's services, identification of the appropriate subcontractor tier designation (I, II, III, IV), budget, verification that the subcontractor is licensed in the state where the services are being performed, location of a copy of this license, verification that BBL has received a certificate of insurance from this subcontractor, and the location of a copy of this certificate.
I	The Project Manager is responsible for identifying Quality Assurance procedures that are applicable to the project and for verifying that personnel are appropriately trained prior to commencing related work activities for this project.
J	Identifies supplemental information for use by the project team. This includes the location of the Client Account Plan, Client Quality Plan (QP 2 05), the Proposal/Budget Letter, Project Authorization Form, Project Organization Chart, Project Bar Chart Schedule, Project Kick-off Meeting Minutes (if available prior to distribution of the Project Plan), and any other background information needed by the project team to successfully perform project activities. Project Managers may elect to attach the supplemental information to communications with team members.

B. CONTROL OF CHANGES

Changes in project scope and requirements often occur. Identification, documentation, evaluation, and reporting of changes are essential. Changes that affect technical, budgeting, and/or scheduling activities may result from, but are not limited to:

- Incomplete early project data and interpretations;
- Changes in site conditions;
- New scientific and engineering knowledge and developments;
- Newly defined or perceived project needs;
- Regulatory revisions;
- Innovation, and
- Schedule deviations

Change simply means that original plans are altered in response to information or events that occur during the course of

BBL	TOPIC		PROJECT PLANNING AND REVIEW	QP 2.01
	Revision B (12/19/02)	SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED All

work. Changes may have no effect on the final product, or they may require redirection of the work so that a different end product is reached. When necessary, the Project Manager will notify the client and receive approval prior to implementing any change. Following the identification of changes, the Project Manager will notify appropriate personnel of the change, document why the change is needed, verify that appropriate approvals have been performed, communicate new instructions or directions to the project staff, and ascertain that affected documents are reviewed, as necessary. Changes may consist of one or a combination of the following:

- Change that does not directly affect the project contract (i.e., technical change);
- Change in work scope that will result in contract modification (i.e., contractual change); or
- Change in the project plan (e.g., personnel change).

Change Order (Technical)

Technical change is a variance from original work instructions that occurs during the normal course of work. When necessary, the Project Manager will notify the client and receive approval prior to implementing any change. Project personnel performing field or office activities are responsible for identifying and documenting such changes and notifying the Project Manager for evaluation. Approval must be obtained from the Project Manager prior to initiating any planned change in BBL's scope of services or deliverable(s).

Documentation of changes is necessary so that changes in the scope of services/work products can be evaluated. The original work instructions, together with documented changes, provide an "as-performed" description of the work. The Project Manager distributes the change in written format to the appropriate team members. The document describing the change is signed and dated by the appropriate project team member. For field operations, initial documentation may be recorded in the field notebook or on the Field Activity Log.

Change Order (Contractual)

A proposed change may be initiated by BBL or by authorized client technical and contract personnel. Contractual changes may require modifications to the contract and/or an individual task order agreement, or may require the creation of a new agreement. BBL's *Project Manager's Handbook* provides guidance for contractual changes and is available on the corporate Intranet.

When both the client and BBL have reviewed the information, and change negotiations have been completed, the client will formally approve or reject the change request. BBL will not commence work on any change until approval is received in writing, unless approval is granted by the Project Officer, or an appropriate officer of BBL. Written authorization by the client is still required and should be provided as soon as possible.

Project Plan Change

Project Planning changes require modifications to the original project planning template. Proposed changes may be identified by any BBL personnel and is authorized by the Project Manager. Planning documents are revised and communicated to all appropriate personnel. Project changes may include, but are not limited to.

- Changes in assigned project personnel;
- Modification of the scope of assessment activities;
- Introduction of a new or alternate subcontractor; and/or
- Changes in project communications

BBL	TOPIC		PROJECT PLANNING AND REVIEW	QP 2.01
	Revision B (12/19/02)	SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED All

C. REVIEW AND IMPROVEMENT DURING PROJECT EXECUTION

Document Review

Documents are reviewed to determine technical acceptability and are approved by an appropriate project team member prior to release, publication, or distribution in accordance with QP 3.01 – Client Document Preparation and Review. QP 3.01.01 provides detailed guidance for the systematic review of a technical document, including design/report drawings. The Project Manager must approve these documents (and have the consent of the PIC) prior to release, publication, or distribution and confirm that the project team has followed QP 3.01.

Peer Review

The decision to perform peer review and the extent of review is based on:

- The technical complexity of the work;
- The experience level of project personnel;
- The complexity of project requirements and procedures;
- The effect of changes or nonconformances on the project schedule and project goals; and
- The potential for liability.

Peer reviewers are independent of the project and involve a person of equal (or greater) technical knowledge in the area of the activities being reviewed. Peer reviewers address the following, as appropriate.

- Do the documents (e.g., evaluations, opinions, conclusions, cost estimates) meet client objectives?
- Have the work plans and procedures been correctly implemented?
- Have analytical procedures been adequately implemented to provide data of sufficient detection limits, accuracy, and precision? Have regulatory requirements been addressed?
- Why have project changes or nonconformances occurred? What are the effects?
- Are the data of adequate quality and quantity to justify and verify conclusions?
- Are assumptions, interpretations, judgments, or decisions defensible? Are they supported by the data?
- Is documentation sufficient to verify the validity of the work product?

The reviewer(s) prepare a report to the Project Manager, the Principal in Charge, and others, as appropriate. A peer review report includes the following

- Date(s) of review;
- Participants (reviewers, project personnel, quality assurance personnel);
- Scope of the review;
- Evaluation of interpretations, decisions, and judgments; and
- Recommendations for changes or additional work.

Project Review

QP 4.05 – Quality Assurance Evaluation provides guidance on the self-assessment process for project review and is available on the corporate Intranet. The progress of work is evaluated to determine whether procedures are being followed, whether project changes or nonconformances have occurred, and what effect of the changes will have on the project. The frequency of these reviews shall be determined by the Principal in Charge.

- END OF PROCEDURE -

Executive

Authorization: _____

Date: _____

BBL	TOPIC		
	PROCUREMENT		QP 2.02
	Revision C (07/28/03)	SECTION Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED ALL

STATEMENT OF POLICY:

It is BBL's policy to procure goods and services in accordance with fair, ethical, and legal trade practices. Goods and services are procured when and where needed, in and of the desired quantity and quality, at the lowest possible price, using the most economical shipping methods, and in accordance with sound inventory practices. Only personnel authorized by BBL may make procurements on behalf of the Firm.

PURPOSE AND SUMMARY OF PROCEDURE:

This procedure defines the common process by which BBL procures goods and services, including leases and rentals.

RESPONSIBILITIES:

Officers have the authority to execute contracts or otherwise enter into agreements that commit the Firm's assets or resources. Officers may delegate their purchasing authority to other individuals in accordance with established protocols for such delegation. Any delegation made by an Officer must be formalized in writing and kept on file in the Legal Division. In the event an Officer delegates or assigns purchasing authority to another individual, that individual must be capable and knowledgeable of the requirements governing BBL's procurement policies and procedures, and be skilled and qualified to properly evaluate the transaction to be undertaken.

Delegated Individuals who have authority to purchase goods or services on behalf of the Firm shall adhere to this procedure.

Project Managers are responsible for the overall administration of this procedure in the procurement of project-related goods and services as follows:

- 1) reviewing Procurement Contracts to verify the inclusion of necessary quality provisions, including the collection of subcontractor insurance certificates prior to BBL's execution of the Procurement Contract;
- 2) evaluating potential subcontractor and supplier proposals; and
- 3) initiating change orders or purchase order amendments for work performed by suppliers and subcontractors.

Project Managers granted authority to purchase goods and/or services for project-related use are not authorized to procure non-project-related goods or services, including standard or non-standard equipment purchases (refer to PPM 3.02.01 for additional clarification). Purchases of non-project-related goods and services must be directed to the appropriate Procurement Personnel within the Management Services divisions (see Procurement Personnel, below).

Project Personnel are responsible for using qualified suppliers and subcontractors, documenting subcontractor performance, and notifying the appropriate Procurement Personnel of the evaluation.

Procurement Personnel are responsible for requesting quotations from qualified vendors; providing specific information concerning the scope of work or the item(s) requested; maintaining records of correspondence, meetings, and telephone conversations; and ordering those goods or services within their area or limit of procurement authority. Only corporate Purchasing Personnel have the authority to enter the Firm into a rental, lease, or purchase agreement for non-project-related goods and services, including technical and scientific equipment, real estate, office leases, facility maintenance services and supplies, capital improvements, all company-owned equipment, office equipment (including vehicles, office furniture, and telephone equipment/service, and computer hardware and software.

The **Legal Division** is responsible for reviewing all non-standard procurement agreements or modified BBL Purchase Orders or Procurement Contracts and for obtaining insurance coverage for both project- and non-project-related procurements, as appropriate.

PROCEDURE PROCESS:

BBL	TOPIC		
	PROCUREMENT		QP 2.02
Revision C (07/28/03)	SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED ALL

Procurement transactions can be generally divided into the following three categories

- Goods – tangible or “real” real property
- Services Only – usually professional in nature
- Installed Goods (sometimes referred to as “Works”) – usually non-professional in nature, involving the installation or incorporation of good or materials and/or the use of manually operated equipment.

“Procurement” as an executable action comprises ten basic steps contingent upon the type of goods or services being acquired. The steps in the procurement process are identified below by procurement category.

Table 1. – PROCUREMENT PROCESS BY PROCUREMENT CATEGORY

STEP	GOODS	SERVICES ONLY	INSTALLED GOODS
1	Identify / Assess Your Need		
2	Prepare Bill of Materials	Prepare Bid Specifications	Prepare Bid Specifications and Bill of Materials
3	Identify Potential Suppliers		
4	Solicit Supplier Cost Proposals		
5	Evaluate Supplier Cost Proposals		
6	Award the Procurement Contract		
7	Receive / Evaluate Supplier “Deliverables”		
8	Accept or Decline Supplier “Deliverables”		
9	Inventory /Insure “Accepted” Deliverables		Inventory /Insure “Accepted” Deliverables
10	Dispose of Surplus, Damaged or Obsolete Real Property		Dispose of Surplus, Damaged or Obsolete Real Property

Bid Specifications and/or Bill of Materials establish the “technical” or transaction-specific performance obligations. Technical performance obligations, by way of example, define who the seller is; what is being procured; when it will be needed; how it is to be fabricated, designed, or constructed; where it is to be delivered; and, occasionally, why the goods or services are needed. The general and special terms and conditions of the Procurement Contract define the “commercial” performance obligations. These commercial performance obligations, by way of example, define when payment will be made; under what conditions information disclosures can be made; how contractual disputes will be resolved; or, who will retain risk of loss for delivered goods or services until final acceptance

1.0 Identification/Assessment of Need(s)

The purpose of assessing the need(s) is to define what is needed and why. Examples include

- How can the need be filled?
- Are the identified goods or services available through an in-house or other company resource?
- Is it desirable to transfer the liability for such performance to a supplier or subcontractor?
- How can we obtain the best price, the highest quality, and ultimately, the most responsive acquisition and delivery?

2.0 Preparation of Bid Specification or Bill of Materials.

A detailed list of the goods, services, materials, or equipment required must be prepared. Make and model numbers, quantities, and any other product should be identified. All the information reasonably necessary to obtain the desired goods and services must be included. Supply Request Forms to purchase catalog items or standard office or corporate supplies are available on the corporate intranet or by contacting the Purchasing Division. Form completion and distribution instructions are detailed in PPM 3 02 02.

BBL	TOPIC		PROCUREMENT	QP 2.02
	Revision C (07/28/03)	SECTION Quality Assurance Procedure		
			COMPANY LOCATIONS AFFECTED	ALL

Bid Specifications and Bills of Materials should clearly describe the specific goods, services, materials, or equipment required and levels of acceptable performance. Bid Specifications must include enough essential information to allow a potential subcontractor to prepare a responsive proposal. Bid Specifications should contain, at a minimum, the following information:

- a definition of the need;
- the expertise, knowledge, materials, products, etc. required;
- the proposed solution (if known);
- an estimated work schedule;
- an estimate of cost; and
- a bid response due date.

3.0 Identification of Potential Suppliers.

BBL's Vendor Database and in-house procurement experts are available for vendor referrals or for help in locating potential suppliers and subcontractors. It is important to consider Prime Agreement requirements for Minority- or Women-Owned Business Enterprise or Disabled Veteran Enterprise participation when identifying potential providers. A Vendor Qualification checklist must be obtained or completed for each potential supplier to confirm vendor compliance with BBL's established vendor qualification criteria. Certain vendors have already successfully met BBL's vendor criteria and do not require completed qualification forms and are referred to as Preferred Providers. It may be necessary to obtain a supplemental insurance certificate from a Preferred Provider to comply with the provisions of the Procurement Contract the special conditions described in the Prime Agreement governing the procurement transaction.

4.0 Solicitation of Supplier Cost Proposals.

Solicitation of vendor quotations will be conducted using the forms and documentation appropriate for the goods or services being procured. Procurement documentation must clearly define quality requirements for each vendor deliverable, including all required vendor submittals (e.g., periodic work progress status reports, product warranties, mandated use of specific sampling or testing procedures, reporting formats, required media), to permit validation of conforming deliverables.

Potential suppliers should be provided a copy of the Bill of Materials and/or Bid Specification. The RFP should include the following (a sample RFP is available for reference or by accessing the corporate intranet):

- a copy of the Bid Specification, including a Bill of Materials, when necessary;
- a sample copy of BBL's commercial terms and conditions,
- any Prime Agreement flowdown provisions;
- any other special terms and conditions applicable to the vendor's execution or installation of the desired services, and
- a request for copies of all applicable product and vendor warranties.

Where applicable, the RFP must clearly specify that the supplier is responsible for transportation and risk of loss until BBL accepts delivery at the location designated by BBL. Please note that "F.O.B. shipping point" or "F.O.B. Supplier's Dock" means that BBL is responsible for paying shipping costs and assumes liability for any damage occurring during transportation from the supplier's warehouse to the designated delivery location.

If the purchase is tax-exempt, a copy of the tax-exempt certificate must be attached to the Procurement Contract. If the purchase is not tax-exempt, the supplier must identify the applicable amount of sales or use tax to be charged by the supplier. If the supplier fails to list sales or use tax as a separate line item, the Procurement Contract must state

BBL	TOPIC		Revision C (07/28/03)
	PROCUREMENT		
SECTION		COMPANY LOCATIONS AFFECTED	
Quality Assurance Procedure		ALL	

that the purchase price includes all required taxes in the purchase price.

5.0 Evaluation of Supplier Cost Proposals.

Individual selection of suppliers is based upon overall judgment of price, quality, past performance and related project experience, willingness and capacity to meet schedule and budget requirements, warranties and after-sale service, and/or compatibility with existing procured or installed equipment. Consideration shall also be extended to the plant facilities, technical capability, and financial status of the prospective vendor, as well as the vendor's willingness to accept BBL's commercial terms without modification.

5.1 Additional Evaluation of Contractor-Supplied Quality Documentation

Additional evaluation is required by the Corporate Quality Manager (CQM) or the Corporate Quality Officer (CQO) for any US Environmental Protection Agency (USEPA) Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) site where submittal of a Quality Management Plan, Quality Assurance Manual, or equivalent is required by the Consent Order, Unilateral Administrative Order, or any contractual flowdown provisions. The CQM/CQO will evaluate the documentation based upon the USEPA's Quality Management Plan Checklist.

6.0 Issue/Award of the Procurement Contract.

Three Procurement Contracts have been developed by the Firm to facilitate procurement including purchase orders, professional services subcontract agreements and subcontract agreements. Authorized personnel are permitted to sign any of these three "pre-approved" Procurement Contracts to procure goods or services from Independent Contractors without additional Legal Division review unless the agreement is modified by the supplier. Modified contract terms and conditions require Legal Division review and approval prior to execution by authorized personnel. Payment term modifications require approval by the Vice President responsible for relevant project cash-flow issues. Any accepted changes to the preprinted contract terms and conditions must be initialized and dated by the accepting party.

Use of these alternative Procurement Contract documents is subject to review and approval by the Legal Division. Contact the Legal Division when it appears that the use of vendor purchase orders or other types of agreements to procure goods or services is being considered.

The Legal Division should be contacted when procuring services from former employees or other individuals who do not meet the IRS' Independent Contractor criteria. Alternative Procurement Contracts are available to address the liability associated with this type of procurement on a restricted use basis.

Procurement Contracts are to be executed and distributed as follows:

Table 2. - PROCUREMENT CONTRACT DISTRIBUTION

PART NO.	DISTRIBUTION REQUIREMENTS	DISTRIBUTION COPY
Part 1	To Finance	White Copy with Original Signatures
Part 2	To Supplier/Subcontractor	Yellow Copy
Part 3	File Copy	Pink Copy
Part 4	Project Related – to Legal	Goldenrod Copy – include all attachments (e.g., Scope of Work and Insurance Certificate)
	Non-Project Related – to Purchasing	
Part 5 (of Purchase Orders Only)	Project Related – to Finance	Blue Copy – indicate back orders, demurrage, etc., and include all attachments (e.g., packing slips, installation or handling instruction, warranty)
	Non-Project Related – to Purchasing	

BBL	TOPIC		
	PROCUREMENT		QP 2.02
Revision C (07/28/03)	SECTION Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED ALL	

All contracts between BBL and another legal entity or individual are to be prepared and executed in written form, except for legitimate Emergency Procurements executed in accordance with this procedure. The Firm will not accept as legally binding any oral agreement that is not finalized and executed in written form.

6.1 Contract Amendments.

During the active life span of any given Procurement Contract, it may be necessary to:

- change or modify a bill of materials or a scope of services;
- change a delivery date or modify a period of performance;
- increase or decrease the dollar amount of the original Procurement Contract,
- exercise a renewal option;
- modify a commercial term to reflect modifications to the agreement's technical terms; or
- terminate the agreement early for convenience or for cause.

Any required modifications to a Procurement Contract must, like the contract it is amending, be issued in written form. Subcontract Change Order and other amendatory forms are available for use through the corporate intranet or by contacting the Legal Division. Subcontractor Change Order forms and Purchase Order Amendments are to be issued in four or five parts, respectively, and distributed in the same manner as the agreements these forms are amending.

6.2 Emergency Procurement Procedures.

Consistent with the emergency, submit a request to the appropriate Procurement Personnel by the most expedient means. To initiate an emergency procurement, contact the appropriate Purchasing Personnel to obtain a Purchase Order or Procurement Contract number. This number will be assigned to the transaction, with the hard copy of the form held in reserve for completion and submittal by the individual requesting the emergency procurement within three (3) days after receipt of the oral authorization. The Procurement Contract shall be clearly marked "CONFIRMING EMERGENCY PROCUREMENT ORDER," and shall reference the assigned order number. All sales slips and packing lists must be attached to the Confirming Procurement Contract.

7.0 Receipt and Evaluation of Supplier Deliverables.

Upon receipt of the procured goods and services, all items must be inspected for damage and/or compliance with the terms of the Purchase Order. For all goods, a written Receiving Report documenting any damage, shortages, or other discrepancies must be prepared that includes all related shipping papers as appropriate.

8.0 Acceptance or Declination of Supplier Deliverables.

All delivered goods or services must conform to samples or specifications. Non-conforming goods or services must be promptly replaced with conforming goods or services. Failure by the supplier to comply with the terms of the Procurement Contract is cause for a contract default.

The vendor/supplier and/or delivery personnel are to be promptly notified in writing of any damage, shortages or deficiencies in performance of the goods and services. Appropriate written documentation of such notification and communications must be maintained. Any variations or discrepancies must be reported to the supplier as soon as possible or within 48 hours following receipt of the deliverable or as otherwise required under the terms of the Procurement Contract. Non-compliant or damaged goods must be returned to the supplier at the supplier's expense. Corrective actions to be taken by the vendor/supplier, and completion of same, should also be documented.

Leased or rented equipment deliveries must be inspected before the delivery driver departs the site under penalty of claim forfeiture. The employee receiving the delivery must describe any damages or shortages on both BBL's and the vendor's copy of the delivery slip or freight bill. If the equipment received is damaged or in poor operating condition, delivery is to be refused unless stated otherwise in the Procurement Contract or any vendor equipment

BBL	TOPIC <p style="text-align: center;">PROCUREMENT</p> <p style="text-align: right;">QP 2.02</p>	
Revision C (07/28/03)	SECTION <p style="text-align: center;">Quality Assurance Procedure</p>	COMPANY LOCATIONS AFFECTED <p style="text-align: center;">ALL</p>

warranties attached to the Procurement Contract

Claims for damage occurring “in transit” must be reported to the delivery carrier within ten (10) days of the delivery date. The carrier must inspect the packing materials, as well as the damaged article, to avoid claim denial. Hold merchandise and all packing materials for the carrier’s inspection. Provide the Legal Division with a damage report describing the type of damage and location of material to be inspected by the delivery carrier.

8.1 Subcontracted Laboratory Services.

If subcontractor services are used for specialty laboratory analyses, the use of proficiency samples is a viable means for the subcontractor to demonstrate capability. As an alternate, the participation of a subcontract laboratory in recognized proficiency programs shall be made available upon request.

8.2 Credit Memos.

A credit memo is required by BBL whenever goods are returned to a vendor. The Procurement Division initiating the return is responsible for collecting and forwarding a vendor credit memo to Finance to offset any previously received vendor invoice for such returned goods.

9.0 Inventory/Insurance of Accepted Supplier Deliverables.

All non-consumable goods owned by the Firm are assigned individual Asset Numbers by the Purchasing Division or its designate (as defined in PPM 3.02 01) and tagged accordingly. Site-specific inventories of BBL-owned versus client-owned equipment are required for risk management purposes. Project Managers are directed to the Legal Division for assistance with insurance and site inventory protocols. Project Site Inventory Record forms are available on the company intranet.

10.0 Disposal of Surplus, Damaged, or Obsolete Property.

Disposal of surplus, damaged, or obsolete goods, materials, equipment, and/or other real property, when so authorized or designated for disposal, shall be conducted to obtain the greatest possible revenue. Disposal of company-owned real property shall be conducted by the appropriate Purchasing Division (see Procurement Personnel Responsibilities), reported on a “Transferred, Stolen, Lost or Destroyed Items” form, and forwarded to the Purchasing Division for implementation of the appropriate inventory and/or loss control action. Disposal of client-owned real property shall be conducted by the client-designated Project Manager, subject to BBL’s receipt of written authorization by the client to effect such disposal.

TERMS AND DEFINITIONS:

Acceptance Criteria - Specifications of items, processes, or services defined in program- or project-related documents.

Commercial Terms – Contractual performance obligations that are generally referred to as “general” or “legal” terms and conditions. “Commercial” terms are category-specific and define those terms or conditions unique or common to the procurement of a particular type of good or service, while “technical” terms are transaction-specific and identify such things as who is buying and selling the goods or services, what is being purchased, when and where the goods or services are to be delivered, why the goods or services are needed, and how many units are required or how the services are to be delivered.

Consumables – For the purpose of this QP, tangible goods or materials used up or “consumed” during the item’s useful life cycle.

BBL	TOPIC	
	PROCUREMENT	QP 2.02
Revision C (07/28/03)	SECTION Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED ALL

Credit Memo – Documentation issued by the seller acknowledging the buyer’s right to a payment refund or canceling a debt owed by the buyer to the seller.

Deliverables (procured) - Any tangible or non-tangible goods or services procured by the Firm.

Emergency Procurement – Oral or written procurements that bypass the Firm’s existing procurement protocols in order to prevent loss of life or damage to property, or to mitigate a threat to public health, welfare, or safety.

Flowdown Provisions – The terms and conditions of a principal or “prime” agreement that BBL is obligated, contractually or otherwise, to include in any subordinate Procurement Contracts issued to fulfill the commitments of such principal agreement.

Goods – Tangible, real property.

Independent Contractor – A person or business performing services for another party under an express or implied agreement and is not subject to the other’s control of, or right to control, the manner and means of performing the services

Installed Goods (Works) – See the definition for Non-professional Services.

Negotiated Terms – As used in this QP, the procurement of goods or services using vendor-provided or non-standard BBL Procurement Contracts.

Non-professional Services – A service that requires manual operation or implementation of services. Non-professional Services involve installation or incorporation of goods or materials and/or involve the use of manually operated equipment. Examples include heavy equipment operation, well installation, process equipment installation, the construction trades, and lawn-mowing and landscaping services, and usually result in the production of a tangible other than an opinion-based report.

Prime Agreement – As used in this QP, the principal or “prime” contract between two parties defining the terms and conditions of the initial or “primary” transaction. The prime agreement dictates the terms and conditions of any “subordinate” or sub-tier contracts issued to procure goods or services to fulfill the obligations of the principal contract.

Procurement Document - A purchase order, bid request, contract, change order, drawing, specification, or work agreement.

Professional Service - A service that requires specialized knowledge and training (often through long and intensive academic preparation) or in-depth experience in a particular field or discipline. Professional Services are professional, technical, or consulting services predominantly intellectual in nature. They may include analysis, evaluation, predicting, planning, or recommendation and usually result in the production of an opinion-based report or drawing.

Prequalified Provider – Designation assigned to certain BBL suppliers. Terminology denoting the Firm’s desire to procure goods and services from suppliers in compliance with BBL’s established quality criteria.

Qualification - The verification of a prospective vendor, including an evaluation of safety performance, insurance coverage, and quality procedures.

Service –An activity involving the provision of “labor,” requiring either “physical” (manual or non-professional labor) or “mental” (professional services) exertion.

BBL	TOPIC	
	PROCUREMENT	QP 2.02
Revision C (07/28/03)	SECTION Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED ALL

Small Purchase (1230 or Petty Cash Purchases) – A “one-time only” purchase of a particular item with a procurement value of less than \$1,000 or from a certain vendor, usually resulting from an unanticipated, time-sensitive need or as otherwise permitted in accordance with BBL’s established procedures and policies

Subcontractor – A supplier providing services or installed goods.

Supplier – An outside person or entity providing goods or services in exchange for a fee or other valuable consideration.

Technical Terms – Contractual performance obligations that identify transaction-specific requirements. Technical terms typically define who is buying and selling the goods or services, what is being purchased, when and where the goods or services are to be delivered, why the goods or services are needed, and how many units are required or how the services are to be delivered, as compared to “commercial,” “general,” or “legal” terms that are category-specific and set forth terms or conditions unique or common to the procurement of a particular type of good or service.

Vendor - An outside supplier of goods, materials, equipment, and/or minor services.

- **END OF PROCEDURE** -

Chief Executive

Authorization: _____

Date: _____

BBL	TOPIC		CALIBRATION AND CONTROL OF MEASURING AND TEST EQUIPMENT	QP 2.04
	Revision A (01/01/01)			
		SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED All

STATEMENT OF POLICY:

The Firm uses measuring and test equipment in the course of its activities. Equipment used by BBL and affiliated companies and their subcontractors must be in the condition required for the performance of specified activities. A procedure for performing and documenting calibration and for the preventive maintenance of measuring and test equipment will be followed to provide necessary controls.

1. Purpose

The objective is to provide a standard procedure for the calibration and control of measuring and test equipment, including establishing the correct equipment type, range, accuracy, and precision to meet data collection needs. Equipment must be uniquely identified, calibrated against recognized standards, and maintained to provide reliable performance and to meet the Firm's quality requirements.

2. Responsibility

A. Procedure Responsibility

The Project Manager is responsible for implementation of this procedure. The Field Supervisor is responsible for field equipment and equipment used by subcontractors.

B. Individual Responsibility

All project staff are responsible for verifying calibration status prior to using the equipment, and for operating equipment by approved procedures, documenting information, and reporting equipment malfunctions.

3. Definitions

Accuracy A qualitative evaluation of the agreement between an individual value (or the central tendency of a set of values) and the correct value or the accepted reference value.

Calibration The process of evaluating and standardizing an instrument by determining the deviation from a known standard.

Measuring and Test Equipment Devices or systems used to calibrate, measure, gauge, test, or inspect in order to acquire data.

Precision A qualitative evaluation of measurement data used to describe the dispersion of a set of numbers with respect to its central tendency.

DESCRIPTION OF PROCEDURE:

BBL	TOPIC		CALIBRATION AND CONTROL OF MEASURING AND TEST EQUIPMENT	QP 2.04
	Revision A (01/01/01)	SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED All

All measuring and test equipment will be controlled by a calibration and preventive maintenance program. Instruments that measure a quantity or whose performance must meet stated criteria will be subject to calibration. Calibration of equipment may be performed internally using reference equipment and standards, or externally by agencies or manufacturers. Two types of calibration are presented in this procedure.

- Operational calibration, which is routinely performed as part of instrument usage, and
- Periodic calibration, which is performed at prescribed intervals for equipment such as water-level indicators, pressure recording devices, and thermometers. In general, equipment which can be calibrated periodically is relatively stable in performance.

Preventive maintenance is an organized program of equipment cleaning, lubricating, reconditioning, adjusting, and/or testing intended to maintain proper performance, prevent equipment from failing during use, and maintain reliability.

1. Calibration Procedures

Documented procedures must be used for calibrating measuring and test equipment and reference equipment. Procedures such as those published by the American Society for Testing and Materials (ASTM), U S. Environmental Protection Agency (EPA), or procedures provided by manufacturers will be used whenever possible.

Where pre-established procedures are not available, procedures will be developed. Factors such as the type of equipment, stability characteristics of the equipment, required accuracy and precision, and the effect of error on the quantities measured must all be taken into account. Calibration procedures must include:

- Type of equipment to be calibrated;
- Reference equipment and standards to be used;
- Calibration method and specific procedure;
- Acceptance tolerances;
- Frequency of calibration; and,
- Data recording form.

2 Equipment Identification

Measuring and test equipment owned by BBL and affiliated companies must be uniquely identified using the manufacturer's serial number, a calibration system identification number, or an inventory control tag number. This identification must be attached to the equipment. In addition to the identification number, equipment requiring periodic calibration must bear a label indicating when the next calibration is due. Equipment that is rented or leased for the purposes of measuring and testing must be also be uniquely identified.

All personnel are responsible for verifying calibration status from due date labels or instrument records prior to using the equipment. Measuring and test equipment that is not properly calibrated must not be used.

3. Calibration Frequency

BBL	TOPIC		CALIBRATION AND CONTROL OF MEASURING AND TEST EQUIPMENT		QP 2.04
	Revision A (01/01/01)		SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED All

Measuring and test equipment and reference equipment will be calibrated at prescribed intervals and/or as part of operational use. The calibration frequency will depend on the type of equipment, inherent stability, manufacturer's recommendations, intended use, effect of error on the measurement process, and experience. Calibration frequencies may be defined in project-specific plans or in calibration procedures. The Project Manager or Field Supervisor is responsible for specifying the procedures to be followed to meet project data quality objectives.

Scheduled periodic calibration may not be performed for infrequently used equipment; such equipment will be calibrated on an "as needed" basis prior to use, and then at the required frequencies for the duration of its use.

Field equipment will require an operational check (Item 7) prior to use, and then again at the end of the working day. Pre-use calibration should be completed under conditions of anticipated use (e.g., temperature, humidity, atmospheric pressure) if these parameters may influence results.

4. Reference Equipment and Standards

Whenever possible, equipment must be calibrated using reference equipment (i.e., physical standards) and chemical and radioactive standards having known relationships to nationally-recognized standards (e.g., National Institute of Standards and Technology [NIST]) or accepted values of natural physical constants. If national standards or constants do not exist, the basis for the calibration must be documented.

Physical standards may include calibration weights, certified thermometers, standard measurement tapes, gauge blocks, and reference gauges. These are generally used for periodic calibrations. Physical standards must be used only for calibration.

Chemical and radioactive standards may include reagents, solvents, and gases. These may be Standard Reference Materials (SRM) provided by NIST or the EPA, or they may be vendor-certified materials traceable to NIST or EPA SRMs. Chemical and radioactive standards will primarily be used for operational calibrations.

The date of receipt and expiration date must be clearly labeled on the container of each standard. If calibration standards are transferred to additional containers, these containers must be labeled with the name of the standard, the lot number, and the shelf life. Any calibration standard that exceeds its shelf life must not be used and must be discarded.

If equipment is sent to the manufacturer or calibration laboratory for calibration, adequate documentation must be maintained to establish the calibration method, reference standard source, or traceability to recognized standards.

5 Calibration Failure

Equipment failing calibration or becoming inoperable during use will be removed from service and segregated to prevent inadvertent use, or tagged to indicate it is out of service. The equipment must be repaired and properly recalibrated; equipment that cannot be repaired will be replaced.

The results of activities involving equipment that has failed recalibration will be evaluated by the Project Manager. If the results are adversely affected, the findings of the evaluation will be documented and appropriate personnel will be notified.

Periodic calibration of measuring and test equipment does not replace the user's responsibility for verifying

BBL	TOPIC		CALIBRATION AND CONTROL OF MEASURING AND TEST EQUIPMENT	QP 2.04
	Revision A (01/01/01)	SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED All

proper function of equipment. If an equipment malfunction is suspected, the device must be tagged or removed from service, and recalibrated. If it fails recalibration, it must be repaired or replaced.

6. Documentation of Calibration

Records must be maintained for each piece of calibrated measuring and test equipment and each piece of reference equipment. The records must indicate that established calibration procedures have been followed, and that the accuracy of reference chemical and radioactive standards has been verified.

Records for periodically calibrated equipment must include the following minimum information:

- Type and identification number of equipment;
- Calibration frequency and acceptance tolerances;
- Calibration dates;
- The individual and organization performing the calibration;
- Reference equipment and/or standards used for calibration;
- Calibration data,
- Certificates or statements of calibration provided by manufacturers and external organizations; and
- Documentation of calibration acceptance or failure, and of repair of failed equipment.

An individual file folder should be established for each piece of measuring and test equipment to maintain records. Equipment periodic calibration files should contain an equipment calibration and maintenance record, calibration data forms, and/or certification of calibration provided by manufacturers or external organizations, and notice of equipment calibration failure.

Measuring and test equipment used for field investigations will typically be calibrated as part of operational use. For this equipment, records of the calibrations or checks will be documented as part of the test data (e.g., in the field notebook or on a Field Activity Log). Equipment-specific forms may also be developed. These records should include information similar to that required for periodically calibrated equipment. Documentation related to malfunctioning equipment or equipment that fails calibration should also be included in the individual equipment file.

Calibration files for equipment requiring periodic calibration should be sent with equipment that is transferred to allow a continuously updated record to be maintained. Recalibration of sensitive equipment should be performed following the transfer.

BBL	TOPIC		QP 2.04
	CALIBRATION AND CONTROL OF MEASURING AND TEST EQUIPMENT		
Revision A (01/01/01)	SECTION	COMPANY LOCATIONS AFFECTED	
	Quality Assurance Procedure	All	

When measuring and test equipment is rented or leased, procurement documents must specify that a current certificate of calibration must accompany the equipment. This certificate must be maintained with the project documentation calibration records.

7. Operational Checks

Certain equipment may require periodic operability tests or checks to verify that operating systems are within the allowed range. These tests are in addition to formal calibration. Like calibrations, these tests will be performed at specified frequencies, or as part of operational use using reference equipment and standards.

If an instrument fails an operability test, and corrective action cannot bring the instrument into tolerance, it must be removed from service and segregated to prevent inadvertent use, or tagged to indicate it is out of service. Such equipment will be repaired and/or recalibrated.

Operability tests will generally be performed in conjunction with data acquisition. Information recorded must include

- Type and identification number of equipment (e.g., model and serial numbers);
- Test date;
- Individual and organization performing the test;
- Reference equipment and standards used;
- Test data; and
- Documentation of acceptance or failure.

Documentation may be in the field notebook, or on a Field Activity Log.

8. Preventive Maintenance

Preventive maintenance is an organized program of equipment cleaning, lubricating, reconditioning, adjusting, and/or testing intended to maintain proper performance, prevent equipment from failing during use, and maintain reliability. Specific maintenance details may be supplied in project-specific plans. A typical preventive maintenance program includes:

- A listing of the equipment that is included in the program,
- The frequency of maintenance (manufacturer's recommendations or previous experience with the equipment);
- Service contracts;
- Identification of spare parts;
- Items to be checked and specific protocols to be followed; and
- Documentation of maintenance.

Maintenance records of measuring and test equipment must be maintained at the location that is the host for the equipment. Documentation of subcontractor and BBL equipment that is used for an individual project will be included in the project files. Records for multi-project equipment will be maintained by the location that controls the equipment.

Measuring and test equipment must be controlled through the use of sign-out/sign-in records or other suitable

BBL	TOPIC		CALIBRATION AND CONTROL OF MEASURING AND TEST EQUIPMENT	QP 2.04
Revision A (01/01/01)	SECTION		Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED
				All

method Equipment that is returned from field use must be free of contamination, packaged in a manner suitable for storage, and returned to its designated area. Support personnel should be notified of performance problems with any piece of equipment.

- END OF PROCEDURE -

Executive
Authorization: _____

Date:

BBL	TOPIC		CLIENT QUALITY PLANNING AND REVIEW	QP 2.05
	Revision B (07/23/02)	SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED All

STATEMENT OF POLICY:

It is BBL's policy to treat each client as the most important client we have. Effective client-centered planning is essential for meeting or exceeding the quality expectations of our clients. The Principal-In-Charge (PIC) will identify and establish quality measurements and monitor the most significant client expectations. The Client Quality Plan provides a tool for developing and implementing a program to meet or exceed client expectations. The plan adapts to changing client conditions and should be considered a "living" document.

1.0 Purpose

This procedure assists the PIC in identifying key quality elements for a successful client-centered quality program. An effective Client Quality Plan is critical for consistently delivering quality services and products to our clients.

2.0 Responsibility

Identified in the flow chart at the end of this procedure.

3.0 Definitions

Client Expectations. Non-technical or non-contractual opportunities that BBL has identified which enhance our reputation and improve our overall service for the client. These expectations may include the client's corporate goals, strategies, strategic plans, or personal performance goals. Examples include Initial response to all client inquiries within 4 hours; preferred communication channels; adherence to client cultural standards (i.e., no foreign-made vehicles on property).

Client Requirements: Stated or inferred requirements performed by BBL for the delivery of specified products and services. These are typically stated in contractual documents.

Internal Audit. A formal, planned, and documented activity performed to investigate, examine, or evaluate compliance with established criteria. Individuals independent of the activities or program being audited conduct audits. The audit is complete when all nonconformities to the established criteria are resolved and improvements have been implemented.

Nonconformance A deviation from requirements; a deficiency that adversely affects the quality of an item or activity.

Self-assessment A planned and documented activity performed upon one's own area of activity to investigate, examine, or evaluate compliance with established criteria.

4.0 Description of Procedure

The Client Quality Plan is segmented into eight categories, each building upon the previous. The plan identifies significant client expectations, measurable quality objectives based upon these expectations, program communication mechanisms needed to support client activities, unique client requirements associated with invoicing; reinforces self-assessment and audit activities; and plans for overall program review and improvement.

BBL	TOPIC		CLIENT QUALITY PLANNING AND REVIEW		QP 2.05
	Revision B (07/23/02)		SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED
					All

The PIC will address this plan in a manner that enables BBL staff to better understand the needs of the client. PICs will utilize the Form QF-2.05.01 for developing and documenting each Client Quality Plan. Program and Project Managers are guided by this document while developing and maintaining Project Plans (as developed from Quality Procedure 2.01).

Each of the following sections addresses and guides the PIC in the development of a Client Quality Plan. General information to be identified at the beginning of the plan includes:

Client identification The client that has engaged BBL's services.

BBL-management personnel Identification of the management team for the client program

Review/revision plan Pre-established dates allowing for review of the Client Quality Plan.

4.1 Scope of Quality Plan

This section allows the PIC to concisely identify the scope and intended use of this Client Quality Plan.

4.2 Identification of Client Expectations

This section allows the PIC to identify client-specific expectations that may be beyond requirements identified in the contracted Scope of Work. This section is necessary to answer the following question: If met, what expectations would allow the client to view BBL as the best supplier in the industry?

4.3 Client Quality Metrics

This section allows the PIC to establish vital quality measurements to be used for monitoring and improving client expectations. The metrics are used to measure the effectiveness of meeting or exceeding client expectations identified in section 4.2 of this procedure.

4.4 Project Information

Project Site Each specific project is defined to effectively distinguish it from other projects for the client. The address or location description should be included.

Project Managers The PIC will identify the project manager, who will be responsible for the overall direction of the project.

Verification of Project Plans Project plans are required for project authorization. Any exceptions must be documented and approved by the PIC

Training Requirements The PIC will identify appropriate training issues that he/she feels are a necessary component of each project manager's skill base. This may include training programs in the areas as OSHA, Six Sigma, Teamwork, Quality Assurance Procedures, equipment use,

BBL	<div> <div>TOPIC</div> <div>CLIENT QUALITY PLANNING AND REVIEW</div> <div>QP 2.05</div> </div>
Revision B (07/23/02)	<div> <div>SECTION</div> <div>Quality Assurance Procedure</div> <div>COMPANY LOCATIONS AFFECTED</div> <div>All</div> </div>

client-specified, etc.

4.5 Communication Planning

External – Client This section will identify the key methods of communicating to the client, including the documentation and frequency of the communication activity, and the identification of a primary BBL contact.

Internal – Project & Client Team: Internal communication methods should be identified, including the use of e-BBL, e-mail, routine meetings, and conference calls, as appropriate.

4.6 Client Invoicing Requirements

This section allows the PIC to identify specific client invoice. Examples include

- Format for transmittal letter and description of work efforts;
- Purchase Order/Project Authorization requirements; and
- Unique invoicing requirements (i.e. can't bill certain BBL job classifications, etc.).

4.7 Audit and Self-Assessment Planning

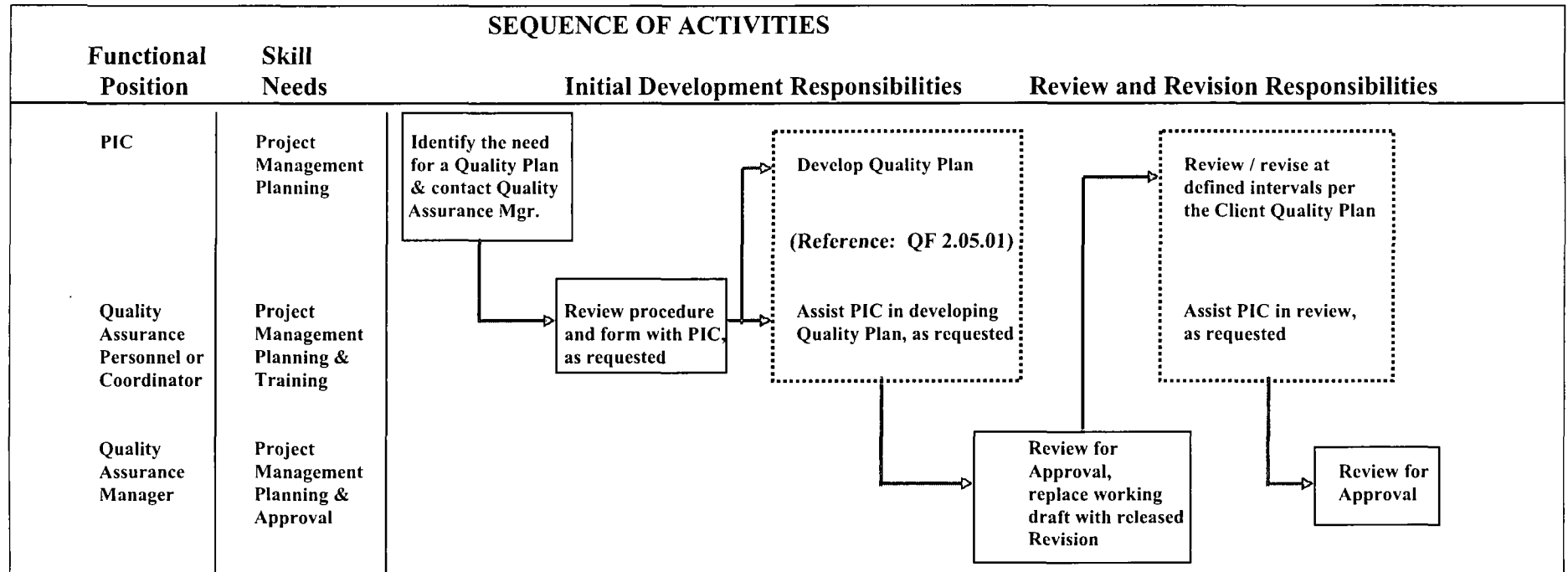
Auditing and self-assessment planning should be outlined in accordance with Quality Assurance Procedures 4.04, Management System Evaluation, and 4.05, Internal Audits. This section allows the PIC to identify specific evaluation requirements for the program.

4.8 Action Items for Next Review

This section allows the PIC to identify and review action items needed to successfully meet the goals set forth in this Client Quality Plan.

BBL Revision A (07/23/02)	CLIENT QUALITY PLAN DEVELOPMENT AND REVIEW SECTION Quality Assurance Procedure	QP 2.05 COMPANY LOCATIONS AFFECTED All
-----------------------------------------	-------------------------------------------------------------------------------------------------	---------------------------------------------------------

5.0 Process Flowchart



- END OF PROCEDURE -

Executive Authorization: _____ Date: _____

BBL	TOPIC		PROPOSAL DEVELOPMENT PROCESS	QP 2.06
	Revision B (11/24/04)	SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED All

STATEMENT OF POLICY:

It is BBL's policy that all requested proposal and qualification documents accurately represent our Firm's ability to provide services that meet or exceed our clients' expectations and protect client confidentiality, as necessary.

Purpose

The objective of this quality procedure (QP) is to provide a common process for the development and delivery of high-quality proposals and to guide response team efforts in making a Go/No-Go decision.

Responsibilities

Principal in Charge (PIC) – The PIC is responsible for providing overall quality assurance of the proposal process, making the Go/No-Go decision, and serving as client liaison.

Officer in Charge – In situations where the PIC has appropriately delegated his or her authority or the proposal activities are not related to a Tier Client, an Officer in Charge is assigned responsibility for providing overall quality assurance of the proposal process, facilitating the Go/No-Go decision, and serving as client liaison.

Proposal Manager – The Proposal Manager has ultimate responsibility for the proposal. The Proposal Manager is responsible for directing and executing this QP – specifically, for selecting the proposed project team and teaming partners/subcontractors/subconsultants; developing the scope of work, financial information, and schedule; and guiding and supervising the response team. When necessary, the Proposal Manager is responsible for delegating his/her authority to an appropriately skilled individual (see Section 4.1).

Response Team – The response team comprises the individuals (see Section 2.1) responsible for immediately addressing questions or uncertainties related to the potential opportunity that must be resolved before a Go/No-Go decision can be made. The response team conducts necessary research, discusses the opportunity with various BBL representatives (e.g., Client Services Committee [CSC], Finance, Legal), gathers information, and provides it to the PIC/Officer in Charge and Proposal Manager.

Project and Support Staff – All staff who participate in proposal planning and development activities are responsible for complying with this QP.

DESCRIPTION OF PROCEDURE:

The proposal development process incorporates five sub-processes (stages) that enable BBL to produce an accurate, realistic, and timely proposal. Each sub-process, described below, establishes a framework for determining the viability of the proposal opportunity, the critical factors influencing the Go/No-Go decision, the staff required to contribute to proposal development, the proposal review process, and the activities required following a win or loss. A flowchart representing the overall proposal process is located at the end of this QP.

1. STAGE 1 – OPPORTUNITY IDENTIFICATION

1.1. Request for Proposal (RFP)

When an RFP (or news of a potential opportunity) from a Tier Client is received by any BBL employee, it is forwarded to the appropriate PIC. An RFP/potential opportunity from a Non-Tier Client must be submitted to and approved by the CSC Chairperson (for industrial services) or the Municipal Business Unit Leader (for municipal services) to fulfill new-client requirements set forth by the CSC.

BBL	TOPIC		PROPOSAL DEVELOPMENT PROCESS		QP 2.06
	Revision B (11/24/04)		SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED
					All

1.2. Unsolicited Proposal

When an unsolicited proposal is being considered, the appropriate PIC/Officer in Charge assumes accountability over the proposal process.

1.3. Significant Opportunity Determination and Activity

A significant opportunity is defined as an opportunity meeting one of the following four criteria:

- gross revenue potential in excess of \$1 0 million,
- NOR potential of \$0.5 million;
- strategic "must win" for a Tier Client; or
- strategic "must win" for an attack team or niche service team.

The CSC Chairperson must be made aware of a significant opportunity within 1 business day of RFP receipt. The CSC Chairperson reviews the opportunity and provides the support necessary to keep adequate resources available and applied throughout proposal development

2. STAGE 2 – GO/NO-GO DECISION

2.1. Response Team Selection

The PIC/Officer in Charge identifies and engages the following:

- Proposal Manager;
- Marketing Communication Specialist (MCS);
- Business Manager;
- Legal Division representative;
- Appropriate technical and support personnel; and
- Appropriate representative of the BBL company best suited to perform the work.

2.2. Response Team Activities

The goal of the response team is to make a sound Go/No-Go decision early in the process (Best Practice Goal: within 72 hours) so that BBL can confidently pursue an opportunity or cease activities before unwarranted time and effort are invested.

2.2.1 Communication Activities

The Proposal Manager sets up and chairs an initial conference call or meeting to review the potential RFP/opportunity with the response team. The MCS helps drive discussion by completing a proposal worksheet and enters the opportunity into the designated tracking database(s).

2.2.2 Conflict Check

All potential and real conflicts must be identified, eliminated, or resolved before moving ahead with the proposal effort. The PIC/Officer in Charge or Proposal Manager (hereafter identified as the Proposal Manager) is responsible for conducting the conflict check and obtaining confirmation from the Legal Division that no conflict exists or that the conflict issue has been resolved. Refer to PPM 10.01.10 (Conflict of Interest) located on the corporate Intranet.

2.2.3 Verification of State Licenses and Certifications

The Proposal Manager is responsible for obtaining confirmation from the Legal Division that the BBL company responding to a proposal or opportunity is licensed to work in the state in question and that proposed personnel possess appropriate state licenses (e g , P.E., P.G., contractor)

BBL	TOPIC		PROPOSAL DEVELOPMENT PROCESS		QP 2.06
	Revision B (11/24/04)		SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED All

2.2.4 Legal/Contract Review

The Legal Division reviews the proposal and terms and conditions to identify and address all potential legal considerations. When a contract is already in place for the soliciting client, the Legal Division identifies the contract number and agreement date, determines the status of the contract, provides legal review, and recommends changes necessary to execute the contract. If the opportunity is for a new client, the Legal Division reviews the Draft Services Agreement in the RFP (if provided). The Legal Division notifies the PIC/Officer in Charge of any clauses presenting legal ramifications that must be resolved prior to contract execution.

2.2.5 Consideration for Site Visit

If a site visit is necessary to obtain pertinent information before the Go/No-Go decision can be made, the Proposal Manager coordinates the site visit with the appropriate parties. The response team develops a list of questions to be confirmed during the site visit and requests that photos be taken (assuming permission to do so is granted).

2.2.6 Consideration for Subcontractors, Subconsultants, and/or Vendors

The Proposal Manager determines whether the services of subcontractors, subconsultants, and/or vendors are necessary to meet RFP requirements, or if they would add value.

2.2.7 Credit Review

The Business Manager gathers and evaluates necessary credit information (e.g., Dunn & Bradstreet, Lexus, SEC search – Annual Reports, 10k, 10q, Public Records/Internet Search) on the prospective client and recommends credit decisions to the PIC/Officer in Charge. This review determines whether the prospective client has the ability and willingness to pay BBL within the terms of our contract. If problems exist, the Business Manager discusses the situation with the PIC/Officer in Charge and the Proposal Manager to determine how to best manage the risk.

2.2.8 Go/No-Go Decision

The Go/No-Go decision is predicated upon sound business analyses, including the Firm's ability to provide appropriate resources to achieve RFP objectives and to satisfactorily resolve the issues identified in Sections 2.1.1 through 2.2.9. The Go/No-Go analysis and decision must be completed in an efficient and timely manner, before the Firm invests unnecessary time and effort. The Go/No-Go form is located on the Corporate Development website and its use is highly recommended for all Go/No-Go decisions.

2.2.9 Decision Notification

If a Go decision is made, the proposal planning process (Stage 3) begins. If a No-Go decision is made, the Proposal Manager notifies the client and response team of this decision and the reasoning behind it.

3. STAGE 3 – PROPOSAL PLANNING

3.1. Expansion of the Response Team

The Proposal Manager selects the technical staff members to support the proposal process.

3.2. Identification of Proposed Project Team Personnel

The Proposal Manager selects the proposed project team. As necessary, the Resource Coordinator(s) assist in the identification of key project personnel. It is imperative that any scheduling conflicts be resolved before personnel are committed to a project.

BBL	TOPIC		PROPOSAL DEVELOPMENT PROCESS		QP 2.06
	Revision B (11/24/04)		SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED
					All

3.3. Kick-off Meeting and Subsequent Communications

The response team addresses the following topics during the kick-off meeting.

- proposal outline, schedule, and team member assignments (see Section 3.4 below);
- analysis of project scope/tasks;
- analysis of client expectations
 - project-specific aspects of the Client Quality Plan, and
 - project-specific goals and objectives based on client expectations;
- project schedule (deliverables and deadlines),
- project team staffing (organizational chart);
- qualifications and experience;
- cost estimates;
- form of submittal;
- BBL distinguishers (advantages) and what it will take to win the work based on the advantages of competitors expected to bid on this work; and
- subcontractor/vendor/subconsultant/teaming partner identification, selection, and roles/responsibilities (as necessary).

3.4. Proposal Outline, Schedule, and Response Team Member Assignments

- The response team develops a proposal outline based on the requirements of the RFP within 1 business day of a Go decision;
- The outline is used to develop the proposal schedule, identify the content requirements of the proposal sections, and determine the availability of response team members and other resources, and
- The outline is used to delegate section writing assignments (with due dates).

4. STAGE 4 – PROPOSAL PREPARATION, REVIEW, APPROVAL, AND DELIVERY

Proposal production follows the steps outlined in QP 3.01 – Technical Documents Process (i.e., planning, execution, approval, and delivery), as well as the following requirements:

4.1 Proposal Manager Responsibilities

- selecting the proposal format (i.e., standard comb-bound, enhanced graphic, letter, or electronic [email or CD-ROM] format),
- assigning the writing of proposal sections (e.g., scope of work by task, project schedule, cost);
- meeting the schedule deadlines;
- soliciting and notifying subcontractor(s)/subconsultant(s)/vendor(s)/teaming partner(s);
- writing (or delegating) the cover letter; and
- conducting final proposal review and maintaining ultimate responsibility for proposal content.
 - In addition to the review requirements of QP 3.01, a final proposal that will be transmitted to the client in electronic format must first be transmitted to a member of the response team for review of content and format. This review will be built into the proposal schedule.

If the Proposal Manager becomes unavailable to the proposal team during the proposal preparation process, he/she must delegate authority for all proposal responsibilities and decisions to an individual approved by the PIC/Officer in Charge. If the Proposal Manager is the PIC/Officer in Charge, approval must be granted by a more senior officer of the Firm. The Proposal Manager will inform all proposal team members of the delegation of authority.

4.2 MCS Responsibilities

BBL	TOPIC		PROPOSAL DEVELOPMENT PROCESS	QP 2.06
	Revision B (11/24/04)	SECTION	Quality Assurance Procedure	COMPANY LOCATIONS AFFECTED All

- helping to establish the proposal schedule;
- entering information about the opportunity into the designated tracking database(s);
- finalizing the outline of the proposal and distributing it to the response team;
- originating text for the introduction, project team, and qualifications and experience sections;
- consolidating and proofreading proposal material developed by the response team;
- working with the Proposal Manager to verify that RFP requirements have been met;
- producing, distributing, and tracking the proposal; and
- updating the Deltek database with new material (e.g. boilerplate, resumes, project profiles).

4.3 Business Manager Responsibilities

- working with the response team to establish/apply a client-specific pricing structure.

4.4 PIC/Officer in Charge Responsibilities

- periodically reviewing and providing final approval of the proposal.

4.5 Additional Response Team Responsibilities

- Response team members are expected to comply with the schedule and with QP 3.01 – Technical Document Process. If a team member cannot meet a deadline, he/she must notify other team members immediately so that measures may be taken to complete, review, and deliver the proposal on time.
- If the schedule is compromised to the point that the performance of the proposal team, the quality of the proposal, or the proposal delivery date may be affected, the Proposal Manager must notify the PIC/Officer in Charge of the proposal immediately. In turn, the PIC/Officer in Charge must notify the Corporate Development Division Leader immediately.
- Response team members meet often (in person and/or by phone) during the preparation of the proposal to quickly identify and resolve potential issues (e.g., content, layout) to avoid impacting the proposal schedule. These discussions also facilitate improvements to proposal content as it is developed.

5. STAGE 5 – LESSONS LEARNED AND WIN/LOSS TRACKING

5.1 Lessons Learned

The MCS initiates an informal proposal debriefing within 1 week of proposal transmittal. At a minimum, the Proposal Manager and MCS attend; however, the entire response team is encouraged to participate. The debriefing focuses on aspects of the proposal and process that were successful or unsuccessful and on client feedback to date, with the goal of identifying and applying successful strategies to future proposal efforts.

5.2 MCS Follow-up

- If the RFP provides an anticipated award date, the MCS contacts the Proposal Manager 1 week after that date (and weekly until the project is awarded) to determine whether the project has been awarded.
- If the RFP does not provide an anticipated award date, the MCS contacts the Proposal Manager 2 weeks after the proposal due date (and weekly until the project is awarded) to determine whether the proposal has been awarded.

5.3 Notification

Once the project is awarded, the Proposal Manager notifies the response team of the outcome and subsequently debriefs the response team regarding the client's reason(s) for selecting BBL or for awarding the project to another firm. The MCS notes the win/loss and reason(s) why BBL was/was not awarded the project (which can and should be integrated into future proposal response strategies) into the designated tracking database(s)